July 13, 2006

DE-9J

VIA E-MAIL AND CERTIFIED MAIL 7001 0320 0005 9025 4240
RETURN RECEIPT REQUESTED

Mr. Matthew Basso
Wyeth
100 Campus Drive
Florham Park, NJ 07932

RE: Approval of Alternative Corrective Measure
for Soil Remediation
World Kitchen, Inc.
OHD 045 205 424

Dear Mr. Basso:

We have completed a review of the *Evaluation of Supplemental Alternative Corrective Measure Remediation* letter report initially submitted on May 4, 2006. A revised evaluation was submitted on June 12, 2006, to address preliminary comments provided by EPA in a May 15, 2006, e-mail. The evaluation of alternative corrective measures was discussed at a February 14, 2006, teleconference call and requested by EPA in a February 15, 2006, e-mail.

Alternative corrective measures were evaluated for Area 1-West, Area 2-West, and Area 3-East at the former World Kitchen, Inc. (WKI) facility, as provided for at Section 4.1.d, Attachment 2, of the Administrative Order on Consent (AOC), U.S. EPA Docket Number RCRA-05-2002-0010. The evaluation did not include Area 4-North. The seven alternatives evaluated were no further action, excavation and disposal (three sub-alternatives), thermal treatment (two sub-alternatives), and paving/capping. The evaluation letter report selects paving/capping (Alternative 4) as the alternative corrective measure to implement for soil remediation.

Each alternative was assessed using evaluation criteria (see Table 1 in the letter report). The evaluation criteria consist of: 1) threshold criteria that reflect the performance standards that remedies should achieve; and 2) balancing criteria that represent a combination of technical measures and management controls. Threshold criteria include protection of human health and the environment, attainment of media cleanup standards, and controlling the source of releases. Typically, if a remedy meets the threshold criteria, balancing criteria are then considered to help identify the best remedy. Balancing criteria include long-term reliability and effectiveness, reduction in the toxicity, mobility, or volume of waste, short-term effectiveness, implementability, and cost.

Table 1 in the evaluation letter report incorrectly lumps threshold and balancing criteria together and carries each alternative corrective measure through the process, even if the alternative does not meet the threshold criteria requirement. However, there are other considerations for selecting the appropriate alternative corrective measure at the former WKI facility. Section 4.1.d, Attachment 2, of the AOC specifically allows American Home Products (currently known as Wyeth) to propose engineering controls as alternative corrective measures. In addition, the soil vapor extraction (SVE) systems installed at the former WKI facility to control sources of VOC contamination in soil as part of the final remedy, have effectively removed over 19,000 pounds of VOCs from the environment over the last 2½ years. The removal of this significant mass of VOCs from soil will expedite the time frame for groundwater cleanup. As part of the final remedy, the groundwater pump and treat system continues to operate, capturing VOCs and preventing their off-site migration.

EPA remedial expectations at the former WKI facility include the remediation of soils contaminated with VOCs to prevent or limit direct exposure to human receptors and prevention of the migration of VOCs from soil to groundwater. These expectations can be met using a combination of treatment, engineering, and institutional controls that protect human health and the environment. Treatment using SVE has already been implemented to remove a significant mass of VOCs from soil. Institutional controls in the form of a deed notice have been established and would supplement engineering controls to prevent or limit exposure to VOCs. Engineering controls (i.e., paving/capping) can be used at Area 1-West, Area 2-West, and Area 3-East to reliably contain VOCs that pose a relatively low long-term risk. In this case, the long-term risks and costs associated with leaving minor amounts of VOCs in soil are insignificant compared to the risk reduction and costs associated with permanent remedies such as excavation or thermal treatment that would not require institutional and engineering controls.

EPA hereby concurs with the proposed alternative corrective measure of paving/capping Area 1-West, Area 2-West, and Area 3-East and approves the proposal in the *Evaluation of Supplemental Alternative Corrective Measure Remediation* letter report submitted on June 12, 2006.

If you have any questions regarding this matter, please contact me at (312) 886-7566 or bardo.kenneth@epa.gov.

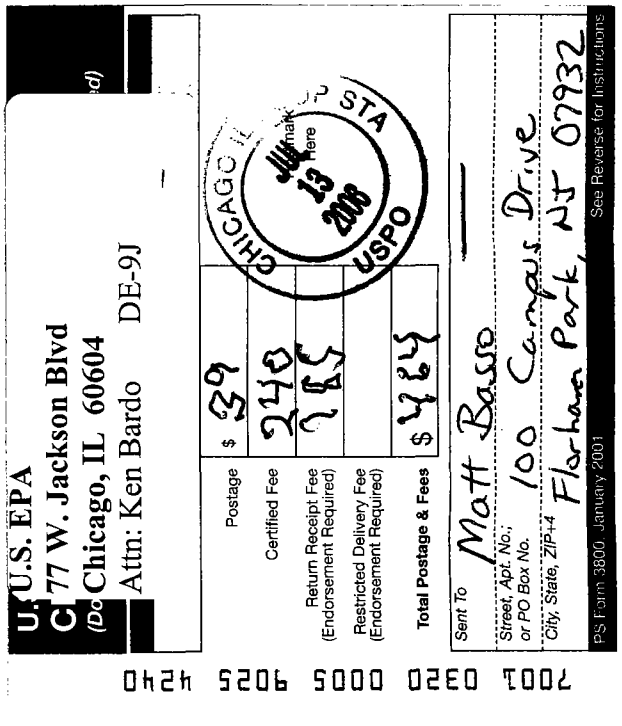
Sincerely yours,

Kenneth S. Bardo

Kenneth S. Bardo
EPA Project Manager
Corrective Action Section

cc: J. Rowlett, WKI
Thomas Cornuet, Weston (via e-mail)
Karen Nesbit, Ohio EPA

OFFICIAL FILE COPY



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July 13, 2006

DE-9J

VIA E-MAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

A3-01 GW Data Total VOCs (TCE)

2/25/04	5/13/04	11/4/04	2/24/05	5/11/05	8/10/05	11/21/05	2/8/06
234 (130)	160 (87)	95 (52)	100 (52)	110 (58)	131 (73)	159 (92)	131 (81)

Mr. Matthew Basso
Wyeth
100 Campus Drive
Florham Park, NJ 07932

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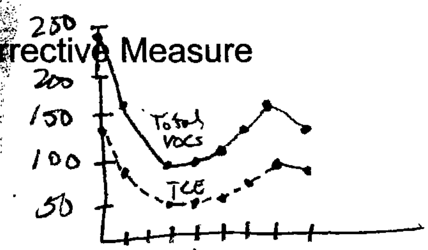

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If you have any questions regarding this matter, please contact me at (312) 886-7566 or bardo.kenneth@epa.gov.

Sincerely yours,

Kenneth S. Bardo
EPA Project Manager
Corrective Action Section

cc: J. Rowlett, WKI
Thomas Cornuet, Weston (via e-mail)
Karen Nesbit, Ohio EPA

OFFICIAL FILE COPY

330-492-2496 (Kathy)

Changes from May Proposal

6/30 W/ KT Cafe Call

- E - Added

2A - No changes. Some changes in cost due to math
3A+4 ↗ (Were 2, 3 & 4 in the first one)

2B - New (lesser volume) Used my numbers (depths + areas)
2C - New (lesser volume than 2B, only 2') (Same area)

3B - Same volume as 2B but ERH (Vendors quotes)

4 - Some (still large area along west side, all capped)
(and 20' square east side)

Ind. perf. std clean up goal in evaluation for some alternatives.

Figure 2 - Alt 4 + Full length (same area)
Alt + 2a + 3a - Same area
Alt + 2b, 2c, 3b - Smaller area (would ~~use to~~ be like 2a+3a if used ~~add~~ soil to GW std)

Table 1 - Some tables with new results + charges

Table 1 costs - 2A 3A & 4 similar but with math changes, went down

2B, 2C + 3B - newly added.

Abandon wells, ~~smaller~~ area, lay gravel, ~~pave~~ put down asphalt. Would like to do in August.

Sparging

East Area - Would shut down sparge systems too.
Provide results in August QPR.
Started @ 350 ppb TCE in beginning, Range 50-75 TCE now
P.7 may QPR → will update in August.

Kenneth Bardo/R5/USEPA/US
05/15/2006 03:13 PM

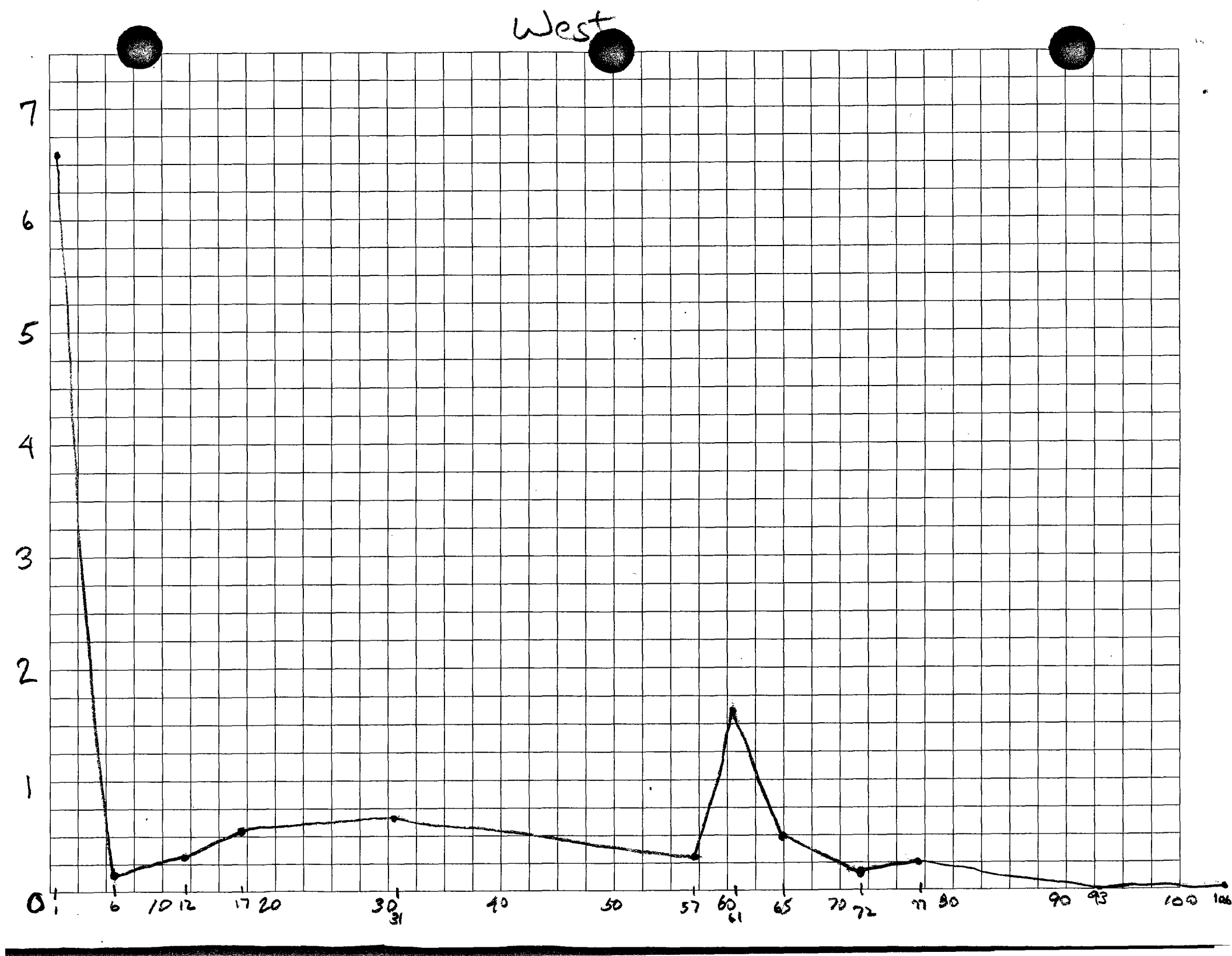
To

Subject WKI Evaluation

Matt and Tom - I performed a cursory review of the May 4, 2006 evaluation for the former World Kitchen facility in Massillon, OH and have a few comments that are quantified in the attached Word document. A much larger area appears to be proposed for remediation in the West Area. Some of the confirmation samples show that the remediation area could be limited. Please review and maybe we could talk later this week or next week. - Ken

WKI Remediation Volume Calculations.doc


40
36
32
28
24
20
16
12
8
4
0
1
4
6
7
8
10
12
15
17
20
22
27
30
31
40
50
52
57
60
61
70
77
80
90
100
106


West
7
6
5
4
3
2
1
0
1
6
10
12
17
20
30
31
40
50
57
60
61
65
70
72
77
80
90
93
100
106

T = TCE
D = C8-1,2-DCE
DE = 11-DCE
TA = 1,1,1-TCA

> Cleanup O/ Soil

West | North | East

Area 1 SB-03-00 T | Area 4 SB-11-00 T, DE | Area 3 SB-01-00 T
Area 1 SB-09-00 T, D | Area 4 SB-12-00 T, D, DE | Area 3 SB-02-00 T
Area 2 SB-10-00 T | Area 4 SB-13-00 T, DE, TA
Area 2 SB-17-00 T | Area 4 SB-14-00 T, D, DE, TA
Area 2 SB-13-00 T
Area 1 SB-19-00 TA

In Area #2, add 2 borings, 1 between SB-15-00 and SB-16-00, and 1 between SB-17-00 and V203.

In Area #4, add 3 borings, 1 between SB-11-00 and SB-13-00, 1 between SB-11-00 and SB-12-00, and 1 between SB-14-00 and SB-09-91

Based on 2000 sample depths and screened intervals of SVE vents
Completion depths @ a minimum should be
10' @ Area 1 ✓ or bedrock encountered if <10'
9' ~~8'~~ @ Area 2 ✓ or bedrock encountered if <9' Clear, may already be defined
15' @ Area 4 or bedrock encountered if <18'. AOC
18' ~~8'~~ @ Area 3 ~~How deep are the vents~~ ?

Reporting - Certify results, state that want to shut down SVE?
Schedule Agree with Asymptotic definition?

Area 1 - V101 → V103 10', screened 5-10'
Area 2 - V201 → 206 8-9.5', 5 ft screen
Area 3 - V 301 → 307 13-23', 15 ft screens
Area 4 - V401 → 413 9.2-19.5', mainly 10' screens

Need to continue to operate air sparging at AS-01 in Area 3 East since TCE exceeds the groundwater performance Std.

	~~Jan~~	Feb	Mar
East	~~2 lb~~	0.8 lb	1.1 lb
West	~~0.6 lb~~	1.3 lb	1.4 lb

North

$\frac{25 \text{ lbs}}{28 \text{ days}}$ (0.9 lbs/Day)

$\frac{48 \text{ lbs}}{26.5 \text{ days}}$ (1.8 lbs/day)

	Feb	Mar
East	0.8 lbs @ 16 days (0.05 lbs/Day)	1.1 lb @ 24.5 days (0.04 lbs/Day)
West	1.31 lbs @ 28 days (0.05 lbs/Day)	1.4 lbs @ 29.5 days (0.05 lbs/d)

1.62

73

$\frac{43}{64}$

57

22 days

2
16
19
16
22
12
21
106

24 106
96

$\frac{25}{176}$

$\frac{3}{7} = \frac{25}{48}$

Kenneth Bardo/R5/USEPA/US
05/12/2006 02:10 PM

To

Subject Fw: WKI Update

Matt and Tom - I received the alternative corrective measures evaluation and will review the proposal. As part of our conference call (see below), we also discussed the need for an indoor air evaluation but I have not yet received any information on the evaluation. Please provide the status so we may move forward in completing the project. Thanks, Ken

-----Forwarded by Kenneth Bardo/R5/USEPA/US on 05/12/2006 01:58PM -----

To: bassom@wyeth.com
From: Kenneth Bardo/R5/USEPA/US
Date: 02/15/2006 10:54AM
cc: tom.cornuet@westonsolutions.com
Subject:

Matt - Thanks for setting up the conference call. As we discussed yesterday, a letter report will be prepared and submitted to EPA that evaluates alternative corrective measures, such as excavation/removal and thermal remediation, in addition to paving, for the West and East Areas. The report will expand on the discussion of corrective measures provided in Weston's January 30, 2006 letter. Please let me know the expected time needed to accomplish this supplemental work.

The letter report would be submitted as provided for in Section 4.1d) of Attachment 2 of the Consent Order and would propose and provide the basis for an alternative corrective measure for protecting human health and the environment. Please evaluate the pros and cons of each possible alternative sufficiently to support the chosen alternative corrective measure.

We also discussed using the North Area air sampling analytical results to provide an updated evaluation of indoor air. July, August, and September 2005 data for TCE showed air sampling results ranging from 3.6 to 6.6 ppmv. More recent data should be available for October through December. The data should be plugged into the Johnson-Ettinger Model using industrial default parameters or documented site-specific parameters for the WKI building. Weston will perform this work. Please contact Bhooma Sundar directly if you have any technical questions on that process. Also let me know the expected time frame for completing and submitting the results.

If you have any questions, I'm available. - Ken

Matthew Basso
<BASSOM@wyeth.com>
02/08/2006 12:14 PM

To

Subject Re: Remediation System Recommendations

Ken,
I look forward to our call on Monday, and I have setup an ATT toll free dia-in number with participant code (see below), and I will ask Tom and Janet of Weston to join us as well.

Conf Call: EKCO-Massillon (WKI) Project
Date/Time: ~~Monday~~ Tues Feb/13th; 2:00pm est
ATT Dial-in No.: ~~1-888-422-7101~~ 1-877-214-0402
Participant Code: 851705 845184

Matt

R0813
Reserve 1-2P

AT&T | TeleConference Services

TeleConference Folder Id: 1174665219

[redacted]

Information is subject to change. If so, you will be notified by a TeleConference Associate. Cancel reservations at least 30 minutes before start time to avoid No Show fees. Please review this information and contact TeleConference Services at (800)526-2655 if there are any changes.

ACCESS INFORMATION

Audio Conference

Toll Free Dial In Number: (888)422-7101

HOST CODE: 486210

PARTICIPANT CODE: 851705

CONFERENCE INFORMATION

Start Date and Time	End Date and Time	Duration

Identification Ports

Conference Name: ZMB7863

Total Ports: 4

Features Selected

☑ Automatic Port Expansion

HOST and ARRANGER INFORMATION

Matthew Basso, CHMM
Wyeth
Environmental Affairs
Five Giralda Farms
Madison, NJ 07940
tel: (973) 660-6726
fax: (973) 660-7326

>>> <Bardo.Kenneth@epamail.epa.gov> 2/7/2006 5:18:55 PM >>>
Matt - Monday, Feb 13 at 2P ET will work. I'll be available at (312) 353-5629. I'd like to discuss a few issues such as:

The estimate of VOC mass and contaminated soil volume remaining in the West Area.
Other potential alternative corrective measures.
Long-term goals for the West Area.
Air sparging in the East Area.
Changes in PRG values.
Uses for the proposed paved area.

Until next week, Ken

Matthew Basso
<BASSOM@wyeth.com>

02/07/2006 09:57 AM

To
Kenneth Bardo/R5/USEPA/US@EPA

cc
cornuett@westonsolutions.com

Subject
Re: Remediation System Recommendations

Hi Ken,
I am available each day during the week of Feb/13th
for a conf call - the late mornings work for me:
- 11:00 am est; and
- afternoons work after 2pm est.

I am traveling out west Feb/20th -Feb/26th and back
in office week of Feb/27th. During week of Feb/27th
again I am best late mornings: 11:00 am est;
and the afternoon's after 2pm est.
thanks,
Matt
(Tom, per my voice message lets see what work for Ken, then
we can confirm a date for the call.)

Matthew Basso, CHMM
Wyeth
Environmental Affairs
Five Giralda Farms
Madison, NJ 07940
tel: (973) 660-6726
fax: (973) 660-7326

>>> <Bardo.Kenneth@epamail.epa.gov> 2/6/2006 5:38:23 PM >>>
Hi. Matt - Received the Jan. 30th letter proposing an alternative corrective measure for the West and East Areas at the WKI facility in Masillon, Ohio. We would like to discuss this further with you before formalizing a written response. Please propose a few days in the near future for a conference call and I'll see how they work for us.
Thanks, Ken

Kenneth Bardo/R5/USEPA/US
02/07/2006 04:18 PM

To Matthew Basso <BASSOM@wyeth.com>
cc cornuett@westonsolutions.com
bcc
Subject Re: Remediation System Recommendations

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Until next week, Ken

Matthew Basso <BASSOM@wyeth.com>

Matthew Basso <BASSOM@wyeth.com>
02/07/2006 09:57 AM

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Tuesday, 2/14 Conf. Call @ 1PM

- Look @ current values in 2/15 Quarterly Progress Reports for soil gas.

→ Plug-into J+E ~~model~~ with industrial defaults to see if indoor air OK. ~~0.13 → 0.2 ppmv last 2 months (total VOCs~~

→ ~~2.7 ppmv TCE, 5.2 ppmv TCE, 12 ppm TCE~~
~~1 mos 2 mos 3 mos~~
~~Sandy soil~~

→ Assumptions for bldg. to be performed by Weston.

→ Uniform Restrictive Covenants would complement pavement scenario.

→ Air Sparging operating done. Passive venting. SVE system to be removed.

⊕ Send e-mail to document agreements. Timeframe for resubmitting CM alternative for approval (disapproval) and J&E model.

tom.cornuet @ westonsolutions.com
bassam @ wyeth.com

...ing in 16.2
(W) SVE system in Ec...
Stille...

mg/kg	Migration to Groundwater		Industrial Direct Contact			Residential Direct Contact			Groundwater MCLs	
	AOC	PRGs	AOC	PRGs 10^{-6}	PRGs 10^{-5}	AOC	PRGs 10^{-6}	PRGs 10^{-5}	AOC	SWDA
1,1-DCE	120	60	120	410,000	4,100,000	54	120,000	1,200,000	7	
total 1,2-DCE	1500	400	150,000	150,000	1,500,000	43,000	43,000	430,000	70	
1,1,1-TCA	6140	2000	1,400,000	1,200,000 (sat)	1,200,000?	630,000	1,200,000 (sat)	1,200,000?	200	
TCE	230	60	6,100	110	1,100	2,800	53	530	5	
	↑ Performance Goal									

Meet with Chris Bhooma

"Concentrations that they have found" in both Areas for excavation.

AOC - Check May 1994 SSL's

AOC Nos. different than PRG nos?

Met test for negligible removal rate

AOC options if soil confirmation sampling does standards are met:

1) Reevaluate Soil Performance Standards, Use 10^{-5}
2) Evaluate alternative corrective measures (can be eng

We approve or disapprove based on applicable regulations in effect.

Tom Cornuet → M,T,W,F; performance
mon. 13th anytime
15th Quarterly

EKCO Conf. Call
Monday the 13th is Best

TCE < 1.1 ppm

1) What is the
2) Other alternative
3) Evaluate those
4) O+M for pavement
5) Continued source

"Cornuet, Thomas" <Tom.Cornuet@WestonSolutions.com>
03/02/2005 06:32 PM

To

Subject WKI maintenance

Hi Ken,

As I mentioned on the phone, we were able to start the groundwater system back up on Monday 2/14/05.

The WKI groundwater system shut down on Friday 1/21/05 due to failure of the blower motor, which was apparently caused by power surges from starting and stopping major manufacturing equipment at the plant in preparation for the plant auction that was held on Tuesday 1/25/05.

The blower motor was replaced the following Tuesday on 1/25/05, unfortunately the conveyance piping froze in the building due to the extremely cold conditions over the weekend and the lack of heat in part of the building. Two companies that have done maintenance at the site, Ohio Drilling and Dynacom, were hired to evaluate options for thawing the frozen pipes. Neither company was able to provide a reasonable faster remedy other than waiting for the pipes to thaw, which was aided by the relatively warmer weather that followed the first two weeks of February.

All reasonable measures were taken to minimize the maintenance down time, which was a total of 24 days. No significant plume movement would have occurred during this short down time, and a new electrical power source is being brought in to supply separate electric service to the remediation system to prevent power surge problems from occurring in the future. This maintenance period was less than many previous events which occurred in January - February 2003 and other previous years. The SVE/AS systems operated relatively consistently during this maintenance period.

I will be traveling again tomorrow but can be reached on my cell phone at 484.459.0620 and I will try to call you at some point tomorrow or else when I get back in the office on Friday. A discussion of the system start up that occurred 2/14/05 will also be covered in the next quarterly report.

I hope this is helpful and we can also talk more tomorrow or Friday.

Thanks,

Tom Cornuet, PG
Weston Solutions, Inc.
1400 Weston Way
West Chester, PA 19380
(610)701-7360 Fax: (610)701-7401
www.westonsolutions.com

The EDR Radius Map
with GeoCheck®

World Kitchen, Inc.
359 State Street NW
Massillon, OH 44647

Inquiry Number: 906528.1s

January 07, 2003

Environmental Data Resources, Inc.

***The* Source For Environmental Risk Management Data**

3530 Post Road
Southport, Connecticut 06890

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

FORM-BEK

TABLE OF CONTENTS

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc. (EDR). The report meets the government records search requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-00. Search distances are per ASTM standard or custom distances requested by the user.

TARGET PROPERTY INFORMATION

ADDRESS

359 STATE STREET NW
MASSILLON, OH 44647

COORDINATES

Latitude (North):	40.806300 - 40° 48' 22.7"
Longitude (West):	81.533000 - 81° 31' 58.8"
Universal Tranverse Mercator:	Zone 17
UTM X (Meters):	455041.6
UTM Y (Meters):	4517180.0

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property:	2440081-G5 MASSILLON, OH
Source:	USGS 7.5 min quad index

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following government records. For more information on this property see page 5 of the attached EDR Radius Map report:

Site	Database(s)	EPA ID
EKCO HOUSEWARES CO MASSILLON DIV 359 STATE ST EXT NW MASSILLON, OH 44648	FINDS LUST OH Spills RCRIS-LQG RCRIS-TSD RAATS DERR CORRACTS	OHD045205424

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the ASTM E 1527-00 search radius around the target property for the following databases:

FEDERAL ASTM STANDARD

NPL..... National Priority List
Proposed NPL..... Proposed National Priority List Sites
CERCLIS..... Comprehensive Environmental Response, Compensation, and Liability Information System
CERC-NFRAP..... CERCLIS No Further Remedial Action Planned
ERNS..... Emergency Response Notification System

STATE ASTM STANDARD

SWF/LF..... Licensed Solid Waste Facilities

EXECUTIVE SUMMARY

VCP..... Voluntary Action Program Sites

FEDERAL ASTM SUPPLEMENTAL

CONSENT..... Superfund (CERCLA) Consent Decrees
ROD..... Records Of Decision
Delisted NPL..... National Priority List Deletions
HMIRS..... Hazardous Materials Information Reporting System
MLTS..... Material Licensing Tracking System
MINES..... Mines Master Index File
NPL Liens..... Federal Superfund Liens
PADS..... PCB Activity Database System
TRIS..... Toxic Chemical Release Inventory System
TSCA..... Toxic Substances Control Act
SSTS..... Section 7 Tracking Systems
FTTS..... FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

EDR PROPRIETARY HISTORICAL DATABASES

Coal Gas..... Former Manufactured Gas (Coal Gas) Sites

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

Elevations have been determined from the USGS 1 degree Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. EDR's definition of a site with an elevation equal to the target property includes a tolerance of +/- 10 feet. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property (by more than 10 feet). Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

FEDERAL ASTM STANDARD

RCRIS: The Resource Conservation and Recovery Act database includes selected information on sites that generate, store, treat, or dispose of hazardous waste as defined by the Act. The source of this database is the U.S. EPA.

A review of the RCRIS-SQG list, as provided by EDR, and dated 09/09/2002 has revealed that there are 3 RCRIS-SQG sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
SAN DEN INC	***651 3RD ST NW***	***1/4 - 1/2 SSE***	***A4***	***14***
FARINA MOTORS INC	***1070 FIRST ST NE***	***1/4 - 1/2 NE***	***11***	***17***
MASSILLON PLAQUE CO	***630 ERIE ST N***	***1/4 - 1/2 SE***	***15***	***18***

EXECUTIVE SUMMARY

STATE ASTM STANDARD

SHWS: The Master Sites List is comprised of sites in Ohio where there is evidence of, or it is suspected that waste management has resulted in the contamination of air, water, or soil and there is a confirmed or potentialthreat to human health or the environment. Please be advised that this report does not constitute a determination that any site identified in the report is or may be contaminated. The Ohio EPA no longer maintains or publishes the MSL.

A review of the SHWS list, as provided by EDR, has revealed that there is 1 SHWS site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
MASSILLON WELL FIELD / UNKNOWN	***CORNER OF RT 21 / LAKE***	***1/4 - 1/2 NE***	***12***	***17***

LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Commerce Division of State Fire Marshal's List of Reported Petroleum Underground Storage Tank Release Incidents.

A review of the LUST list, as provided by EDR, and dated 08/18/2002 has revealed that there are 5 LUST sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
OHIO PACKAGING CORP.	***772 3RD ST NW***	***1/8 - 1/4 SE***	***2***	***13***
MASSILLON CABLE T.V., INC.	***814 CABLE CT NW***	***1/4 - 1/2 SSW***	***B6***	***15***
MASSILLON SEWER PIPE	340 LAKE AVE NW	1/4 - 1/2 NNE	8	16
FARINA MOTORS INC	***1070 FIRST ST NE***	***1/4 - 1/2 NE***	***11***	***17***
BUS GARAGE	220 CHERRY ST NW	1/4 - 1/2 SSE	13	18

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Commerce Division of State Fire Marshal's Facility File.

A review of the UST list, as provided by EDR, and dated 12/08/2002 has revealed that there are 3 UST sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
OHIO PACKAGING CORP.	***772 3RD ST NW***	***1/8 - 1/4 SE***	***2***	***13***
MASSILLON CABLE T.V., INC.	***814 CABLE CT NW***	***1/4 - 1/2 SSW***	***B6***	***15***
RON'S TRUCKING	1359 3RD ST NW	1/4 - 1/2 NNE	14	18

FEDERAL ASTM SUPPLEMENTAL

FINDS: The Facility Index System contains both facility information and "pointers" to other sources of information that contain more detail. These include: RCRIS; Permit Compliance System (PCS); Aerometric Information Retrieval System (AIRS); FATES (FIFRA [Federal Insecticide Fungicide Rodenticide Act] and TSCA Enforcement System, FTTS [FIFRA/TSCA Tracking System]; CERCLIS; DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes); Federal Underground Injection Control (FURS); Federal Reporting

Data System (FRDS); Surface Impoundments (SIA); TSCA Chemicals in Commerce Information System (CICS); PADS; RCRA-J (medical waste transporters/disposers); TRIS; and TSCA. The source of this database is the U.S. EPA/NTIS.

A review of the FINDS list, as provided by EDR, and dated 10/10/2002 has revealed that there are 6 FINDS sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
TOWER INDS. LTD.	655 3RD ST. N.W.	1/4 - 1/2 SSE	A3	14
SAN DEN INC	***651 3RD ST NW***	***1/4 - 1/2 SSE***	***A4***	***14***
MASSILLON CABLE TV INC	814 CABLE CT NW	1/4 - 1/2 SSW	B7	15
AMVETS POST 12	653 EARL RD	1/4 - 1/2 NNW	10	16
FARINA MOTORS INC	***1070 FIRST ST NE***	***1/4 - 1/2 NE***	***11***	***17***
MASSILLON PLAQUE CO	***630 ERIE ST N***	***1/4 - 1/2 SE***	***15***	***18***

STATE OR LOCAL ASTM SUPPLEMENTAL

SPILLS: The Spills Database comes from the Ohio EPA.

A review of the OH Spills list, as provided by EDR, has revealed that there are 2 OH Spills sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
Not reported	988 CHERRY RD NW	1/4 - 1/2 SW	5	14
Not reported	1 STATE AVE NW	1/4 - 1/2 ESE	9	16

A review of the DERR list, as provided by EDR, and dated 06/01/2002 has revealed that there is 1 DERR site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
MASSILLON WELL FIELD / UNKNOWN	***CORNER OF RT 21 / LAKE***	***1/4 - 1/2 NE***	***12***	***17***

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

Site Name	Database(s)
EATON CORP	RCRIS-SQG, FINDS, TRIS, CERC-NFRAP
MASSILLON'S EARTH RETURN	SWF/LF
FEICHTER'S YARD WASTE	SWF/LF
MASSILLON STP	SWF/LF
CANTON ELEVATOR CO INC	RCRIS-SQG, FINDS
MASSILLON, CITY OF	MLTS

OVERVIEW MAP - 906528.1s - Weston Solutions, Inc.

- ☆ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Coal Gasification Sites
- National Priority List Sites
- Landfill Sites
- Power transmission lines
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone

TARGET PROPERTY:	World Kitchen, Inc.	CUSTOMER:	Weston Solutions, Inc.
ADDRESS:	359 State Street NW	CONTACT:	David Lls
CITY/STATE/ZIP:	Massillon OH 44647	INQUIRY #:	906528.1s
LAT/LONG:	40.8063 / 81.5330	DATE:	January 07, 2003 7:05 am

DETAIL MAP - 906528.1s - Weston Solutions, Inc.

- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- Coal Gasification Sites
- Sensitive Receptors
- National Priority List Sites
- Landfill Sites

- Power transmission lines
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone

TARGET PROPERTY:	World Kitchen, Inc.	CUSTOMER:	Weston Solutions, Inc.
ADDRESS:	359 State Street NW	CONTACT:	David Lis
CITY/STATE/ZIP:	Massillon OH 44647	INQUIRY #:	906528.1s
LAT/LONG:	40.8063 / 81.5330	DATE:	January 07, 2003 7:05 am

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
FEDERAL ASTM STANDARD								
NPL		0.500	0	0	0	NR	NR	0
Proposed NPL		0.500	0	0	0	NR	NR	0
CERCLIS		0.500	0	0	0	NR	NR	0
CERC-NFRAP		0.500	0	0	0	NR	NR	0
CORRACTS	X	0.500	0	0	0	NR	NR	0
RCRIS-TSD	X	0.500	0	0	0	NR	NR	0
RCRIS Lg. Quan. Gen.	X	0.500	0	0	0	NR	NR	0
RCRIS Sm. Quan. Gen.		0.500	0	0	3	NR	NR	3
ERNS		0.500	0	0	0	NR	NR	0
STATE ASTM STANDARD								
State Haz. Waste		0.500	0	0	1	NR	NR	1
State Landfill		0.500	0	0	0	NR	NR	0
LUST	X	0.500	0	1	4	NR	NR	5
UST		0.500	0	1	2	NR	NR	3
VCP		0.500	0	0	0	NR	NR	0
FEDERAL ASTM SUPPLEMENTAL								
CONSENT		0.500	0	0	0	NR	NR	0
ROD		0.500	0	0	0	NR	NR	0
Delisted NPL		0.500	0	0	0	NR	NR	0
FINDS	X	0.500	0	0	6	NR	NR	6
HMIRS		0.500	0	0	0	NR	NR	0
MLTS		0.500	0	0	0	NR	NR	0
MINES		0.500	0	0	0	NR	NR	0
NPL Liens		0.500	0	0	0	NR	NR	0
PADS		0.500	0	0	0	NR	NR	0
RAATS	X	0.500	0	0	0	NR	NR	0
TRIS		0.500	0	0	0	NR	NR	0
TSCA		0.500	0	0	0	NR	NR	0
SSTS		0.500	0	0	0	NR	NR	0
FTTS		0.500	0	0	0	NR	NR	0
STATE OR LOCAL ASTM SUPPLEMENTAL								
OH Spills	X	0.500	0	0	2	NR	NR	2
DERR	X	0.500	0	0	1	NR	NR	1
EDR PROPRIETARY HISTORICAL DATABASES								
Coal Gas		0.500	0	0	0	NR	NR	0

AQUIFLOW - see EDR Physical Setting Source Addendum

TP = Target Property

NR = Not Requested at this Search Distance

* Sites may be listed in more than one database

Coal Gas Site Search: No site was found in a search of Real Property Scan's ENVIROHAZ database.

1
Target
Property

EKCO HOUSEWARES CO MASSILLON DIV
359 STATE ST EXT NW
MASSILLON, OH 44648

FINDS 1000325420
LUST OHD045205424
OH Spills
RCRIS-LQG
RCRIS-TSD
RAATS
DERR
CORRACTS

CORRACTS Data:

EPA Id:	OHD045205424
Region:	5
State:	OH
Area Name:	ENTIRE FACILITY
Original Scheduled Date:	Not reported
New Scheduled Date:	Not reported
Actual Date:	4/14/1989
Corrective Action:	CA050 - RFA Completed

EPA Id:	OHD045205424
Region:	5
State:	OH
Area Name:	ENTIRE FACILITY
Original Scheduled Date:	6/30/1997
New Scheduled Date:	5/1/2001
Actual Date:	8/26/2002
Corrective Action:	CA400 - Date For Remedy Selection (CM Imposed)

EPA Id:	OHD045205424
Region:	5
State:	OH
Area Name:	ENTIRE FACILITY
Original Scheduled Date:	6/30/1997
New Scheduled Date:	3/1/2004
Actual Date:	Not reported
Corrective Action:	CA500 - CMI Workplan Approved

EPA Id:	OHD045205424
Region:	5
State:	OH
Area Name:	ENTIRE FACILITY
Original Scheduled Date:	6/30/1999
New Scheduled Date:	3/1/2003
Actual Date:	Not reported
Corrective Action:	CA550 - Certification Of Remedy Completion Or Construction Completion

EPA Id:	OHD045205424
Region:	5
State:	OH
Area Name:	ENTIRE FACILITY
Original Scheduled Date:	Not reported
New Scheduled Date:	Not reported
Actual Date:	4/14/1989
Corrective Action:	CA070YE - RFA Determination Of Need For An RFI, RFIis Necessary

EKCO HOUSEWARES CO MASSILLON DIV (Continued) **1000325420**

The CORRACTS database contains 15 additional records for this site.
Please contact your EDR Account Executive for more information.

RCRIS Corrective Action Summary:

Event: CMI Workplan Approved
Event Date: Not reported

Event: Certification Of Remedy Completion Or Construction Completion
Event Date: Not reported

Event: Date For Remedy Selection (CM Imposed)
Event Date: 08/26/2002

Event: Current Human Exposures under Control, Yes, Current Human Exposures Under Control has been verified. Based on a review of information contained in the EI determination, current human exposures are expected to be under control at the facility under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.
Event Date: 10/01/2001

Event: Igration of Contaminated Groundwater under Control, Yes, Migration of Contaminated Groundwater Under Control has been verified. Based on a review of information contained in the EI determination, it has been determined that migration of contaminated groundwater is under control at the facility. Specifically, this determination indicates that the migration of contaminated groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the existing area of contaminated groundwater. This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.
Event Date: 12/29/2000

Event: Current Human Exposures under Control, More information is needed to make a determination.
Event Date: 08/28/1997

Event: Igration of Contaminated Groundwater under Control, More information is needed to make a determination.
Event Date: 08/28/1997

Event: Stabilization Construction Completed
Event Date: 04/29/1994

Event: CMS Approved
Event Date: 03/30/1994

Event: CMS Approved
Event Date: 02/08/1994

Event: Stabilization Measures Evaluation,This facility is amenable to stabilization activity based on the status of corrective action work at the facility, technical factors, the degree of risk, timing considerations and administrative considerations.
Event Date: 12/31/1993

EKCO HOUSEWARES CO MASSILLON DIV (Continued) **1000325420**

Event: RFI Approved
Event Date: 11/03/1993

Event: CA Prioritization, Facility or area was assigned a high corrective action priority.
Event Date: 09/29/1992

Event: CA Prioritization, Facility or area was assigned a medium corrective action priority.
Event Date: 09/27/1991

Event: Stabilization Construction Completed
Event Date: 03/20/1991

Event: RFI Workplan Approved
Event Date: 01/16/1991

Event: CMS Workplan Approved
Event Date: 01/16/1991

Event: RFA Completed
Event Date: 04/14/1989

Event: RFI Imposition, Focused data collection required for stabilization evaluation.
Event Date: 04/14/1989

Event: RFA Determination Of Need For An RFI, RFI is Necessary;
Event Date: 04/14/1989

RCRIS:
Owner: NAME NOT REPORTED
(312) 555-1212
EPA ID: OHD045205424

Contact: TOM MARCOVECHIO
(216) 832-5026

Rank Status: 1
Rank Date: 09/30/1992
Classification: Large Quantity Generator, TSDF
Used Oil Recyc: No
TSDF Activities: Not reported

BIENNIAL REPORTS:
Last Biennial Reporting Year: 1999

Waste	Quantity (Lbs)
D001	13050.00

Violation Status: Violations exist

Regulation Violated: 3745-52-34(C)(1)(b)
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/21/1999
Actual Date Achieved Compliance: 12/21/1999

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/30/1999
Penalty Type: Not reported

Regulation Violated: 3745-52-11
Area of Violation: GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined: 12/21/1999
Actual Date Achieved Compliance: 01/31/2000

EKCO HOUSEWARES CO MASSILLON DIV (Continued) **1000325420**

Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/30/1999
Penalty Type:	Not reported
Regulation Violated:	3745-65-35
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	12/21/1999
Actual Date Achieved Compliance:	01/31/2000
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/30/1999
Penalty Type:	Not reported
Regulation Violated:	3745-66-47
Area of Violation:	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined:	12/13/1993
Actual Date Achieved Compliance:	01/18/1994
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/14/1993
Penalty Type:	Not reported
Regulation Violated:	3745-52-34(C)
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	11/18/1993
Actual Date Achieved Compliance:	12/28/1993
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/06/1993
Penalty Type:	Not reported
Regulation Violated:	3745-52-34(A)
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	11/18/1993
Actual Date Achieved Compliance:	12/28/1993
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/06/1993
Penalty Type:	Not reported
Regulation Violated:	3745-52-33
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	11/18/1993
Actual Date Achieved Compliance:	12/28/1993
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/06/1993
Penalty Type:	Not reported
Regulation Violated:	3745-65-31 & 3745-66-73(B)
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	11/18/1993
Actual Date Achieved Compliance:	01/20/1994
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/06/1993
Penalty Type:	Not reported
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/28/1993
Penalty Type:	Not reported
Regulation Violated:	3745-65-33
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS

EKCO HOUSEWARES CO MASSILLON DIV (Continued) **1000325420**

Date Violation Determined: 01/06/1993
Actual Date Achieved Compliance: 02/19/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/13/1993
Penalty Type: Not reported

Regulation Violated: 3745-65-16(B)/3745-52-34(A)(4)
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 01/06/1993
Actual Date Achieved Compliance: 02/19/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/13/1993
Penalty Type: Not reported

Regulation Violated: 3745-59-07(A)
Area of Violation: GENERATOR-LAND BAN REQUIREMENTS
Date Violation Determined: 01/06/1993
Actual Date Achieved Compliance: 02/19/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/13/1993
Penalty Type: Not reported

Regulation Violated: 3745-59-07(A)(1)(a)
Area of Violation: GENERATOR-LAND BAN REQUIREMENTS
Date Violation Determined: 01/06/1993
Actual Date Achieved Compliance: 02/19/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/13/1993
Penalty Type: Not reported

Regulation Violated: 3745-59-07(A)(1)(B)
Area of Violation: GENERATOR-LAND BAN REQUIREMENTS
Date Violation Determined: 01/06/1993
Actual Date Achieved Compliance: 02/19/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/13/1993
Penalty Type: Not reported

Regulation Violated: 3745-66-42/3745-66-44
Area of Violation: TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined: 07/21/1992
Actual Date Achieved Compliance: 12/24/1992

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 08/11/1992
Penalty Type: Not reported

Regulation Violated: 3745-66-43/3745-66-45
Area of Violation: TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined: 07/21/1992
Actual Date Achieved Compliance: 12/24/1992

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 08/11/1992
Penalty Type: Not reported

Regulation Violated: 3745-66-47
Area of Violation: TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined: 07/21/1992

EKCO HOUSEWARES CO MASSILLON DIV (Continued) **1000325420**

Actual Date Achieved Compliance: 04/14/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 08/11/1992
Penalty Type: Not reported

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/24/1992
Penalty Type: Not reported

Regulation Violated: 3745-65-32
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/03/1991
Actual Date Achieved Compliance: 02/19/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/15/1992
Penalty Type: Not reported

Regulation Violated: 3745-52-34
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/03/1991
Actual Date Achieved Compliance: 02/19/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/15/1992
Penalty Type: Not reported

Regulation Violated: Not reported
Area of Violation: TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined: 06/27/1991
Actual Date Achieved Compliance: 12/24/1992

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 07/08/1991
Penalty Type: Not reported

Regulation Violated: Not reported
Area of Violation: TSD-GOUNDWATER MONITORING REQUIREMENTS
Date Violation Determined: 06/07/1991
Actual Date Achieved Compliance: 10/26/1992

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 07/19/1991
Penalty Type: Not reported

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/05/1991
Penalty Type: Not reported

Regulation Violated: Not reported
Area of Violation: TSD-OTHER REQUIREMENTS (OVERSIGHT)
Date Violation Determined: 03/14/1991
Actual Date Achieved Compliance: 04/24/1991

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 03/20/1991
Penalty Type: Not reported

Regulation Violated: 40 CFR 268
Area of Violation: GENERATOR-LAND BAN REQUIREMENTS
Date Violation Determined: 03/14/1991
Actual Date Achieved Compliance: 04/24/1991

Enforcement Action: WRITTEN INFORMAL

EKCO HOUSEWARES CO MASSILLON DIV (Continued) **1000325420**

Enforcement Action Date:	03/20/1991
Penalty Type:	Not reported
Regulation Violated:	Not reported
Area of Violation:	TSD-LAND BAN REQUIREMENTS
Date Violation Determined:	03/14/1991
Actual Date Achieved Compliance:	04/24/1991
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	03/20/1991
Penalty Type:	Not reported
Regulation Violated:	Not reported
Area of Violation:	TSD-OTHER REQUIREMENTS (OVERSIGHT)
Date Violation Determined:	06/05/1990
Actual Date Achieved Compliance:	01/08/1991
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	06/27/1990
Penalty Type:	Not reported
Regulation Violated:	Not reported
Area of Violation:	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined:	09/21/1989
Actual Date Achieved Compliance:	12/24/1992
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	09/22/1989
Penalty Type:	Not reported
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	03/12/1990
Penalty Type:	Not reported

EKCO HOUSEWARES CO MASSILLON DIV (Continued) **1000325420**

There are 25 violation record(s) reported at this site:

Evaluation	Area of Violation	Date of Compliance
Other Evaluation	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19991221
	GENERATOR-GENERAL REQUIREMENTS	20000131
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	20000131
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19940118
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19931228
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19931228
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19940120
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19931228
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930219
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930219
	GENERATOR-LAND BAN REQUIREMENTS	19930219
	GENERATOR-LAND BAN REQUIREMENTS	19930219
	GENERATOR-LAND BAN REQUIREMENTS	19930219
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19921224
	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19921224
	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19930414
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930219
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930219
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19921224
Compliance Evaluation Inspection	TSD-OTHER REQUIREMENTS (OVERSIGHT)	19910424
Other Evaluation	GENERATOR-LAND BAN REQUIREMENTS	19910424
	TSD-LAND BAN REQUIREMENTS	19910424
Compliance GW Monitoring Evaluation	TSD-GOUNDWATER MONITORING REQUIREMENTS	19921026
Compliance Evaluation Inspection	TSD-OTHER REQUIREMENTS (OVERSIGHT)	19910108
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19921224

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Biennial Reporting System (BRS)
Facility Registry System (FRS)
Ohio Core database (OH_CORE)
Resource Conservation and Recovery Act Information system (RCRAINFO)
Toxic Chemical Release Inventory System (TRIS)

LUST:
Owner: EKCO HOUSEWARES, INC.
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 76000036-N00001
Owner Address: 359 STATE AVE NW
MASSILLON, OH 44646
FR Status: No Further Action letter issued
Old Facility Id: 760036
Former Lust Release Number: 761160900
Release Date: Not reported

EKCO HOUSEWARES CO MASSILLON DIV (Continued) **1000325420**

Owner: EKCO HOUSEWARES, INC.
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 76000036-N00002
Owner Address: 359 STATE AVE NW
MASSILLON, OH 44646
FR Status: No Further Action letter issued
Old Facility Id: 760036
Former Lust Release Number: 763189600
Release Date: Not reported

SPILLS:
Facility ID: 9202-76-0576
Spill Date: 02/92 Date Reported 02/18/92 12:20
Spill Number: 9202-76-0576
Size of Spill: Medium Priority: Respond When Possible or Convenient
Cause: Leak Reason: Unknown reasons
Affected Area: Land or land surface impact
Material: TRICHLOROETHANE
Type: Hydrocarbon ie: crude oil, natural gas, gasoline, waste oil
Units: gallons
Affected Area: Post-88 surface water
Material: Not reported
Type: Not reported
Units: Not reported
Waterway Affctd: Not reported
Spill Source: Fixed Facility, Industry, Tank storage (above ground)
Reportable Qnty: Not reported
Name of Company or person that had spill:
EKCO HOUSEWARES INC
PO BOX 560
MASSILLON, OH 44608
Suspected Spiller: Not reported
Carrier: 0560

DERR:
Facility Id: 276-1019
Lat/Long: 40 48 25 / 81 32 00
EPA ID: OHD045205425
Voluntary Action Program: False

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2 SE 1/8-1/4 1208 ft. Higher **OHIO PACKAGING CORP.** **LUST U000895638**
772 3RD ST NW **UST N/A**
MASSILLON, OH 44648

LUST:
Owner: JOE WILLIAMSON
Facility Status: Inactive
LTF Status: 1 SUS/CON from regulated UST
Release Number: 76000139-N00001
Owner Address: PO BOX 850
MASSILLON, OH 44648
FR Status: No Further Action letter issued
Old Facility Id: 760139
Former Lust Release Number: 761225700
Release Date: Not reported

OHIO PACKAGING CORP. (Continued) **U000895638**

UST:

Facility ID:	76000139	Tank ID:	T00001
Owner:	OHIO PACKAGING CORP.		
Owner Address:	PO BOX 850 MASSILLON, OH 44648		
Capacity:	10000	Tank Status:	Currently In Use
Install Date:	07/01/91		
Content:	Diesel		
Tank Type:	Fiberglass Reinforced Plastic;Double Walled (Int		
Facility ID:	76000139	Tank ID:	T00002
Owner:	OHIO PACKAGING CORP.		
Owner Address:	PO BOX 850 MASSILLON, OH 44648		
Capacity:	10000	Tank Status:	Currently In Use
Install Date:	07/01/91		
Content:	Diesel		
Tank Type:	Fiberglass Reinforced Plastic;Double Walled (Int		

A3 **TOWER INDS. LTD.** **FINDS** **1006145765**
SSE **655 3RD ST. N.W.** **44647TWRND65**
1/4-1/2 **MASSILLON, OH 44647**
1764 ft.
Higher **Site 1 of 2 in cluster A**

A4 **SAN DEN INC** **RCRIS-SQG** **1000834278**
SSE **651 3RD ST NW** **FINDS** **OHD987051299**
1/4-1/2 **MASSILLON, OH 44647**
1785 ft.
Higher **Site 2 of 2 in cluster A**

RCRIS:

Owner:	HOWALD DENNIS (216) 833-4300
EPA ID:	OHD987051299
Contact:	DENNIS HOWALD (216) 833-4300
Classification:	Small Quantity Generator
Used Oil Recyc:	No
TSDF Activities:	Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Resource Conservation and Recovery Act Information system (RCRAINFO)

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5 **OH Spills** **S102902132**
SW **988 CHERRY RD NW** **N/A**
1/4-1/2 **MASSILLON, OH**
1860 ft.
Higher

(Continued) **S102902132**

SPILLS:
Facility ID: 199711--4476
Spill Date: 11/1997 Date Reported 11/12/97 11:07
Spill Number: 9711-76-4476
Size of Spill: Small Priority: Respond When Possible or Convenient
Cause: Cut or Break Reason: Undefined
Affected Area: Land or land surface impact
Material: TRANSFORMER OIL
Type: Hydrocarbon ie: crude oil, natural gas, gasoline, waste oil
Units: Not reported
Waterway Affctd: Not reported
Spill Source: Fixed Facility, Public, Z-Transformers, capacitors, etc
Reportable Qnty: Not reported
Name of Company or person that had spill: Not reported
Suspected Spiller:
OHIO EDISON
1910 W MARKET ST
AKRON, OH 44313
Carrier: Not reported

B6 **MASSILLON CABLE T.V., INC.** **LUST U000690584**
SSW **814 CABLE CT NW** **UST N/A**
1/4-1/2 **MASSILLON, OH 44647**
1886 ft.
Higher **Site 1 of 2 in cluster B**

LUST:
Owner: FAX 330-833-7522
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 76000067-N00001
Owner Address: 814 CABLE CT NW
MASSILLON, OH 44647
FR Status: No Further Action letter issued
Old Facility Id: 760067
Former Lust Release Number: 762006900
Release Date: Not reported

UST:
Facility ID: 76000067 Tank ID: T00001
Owner: MASSILLON CABLE TV, INC.
Owner Address: 814 CABLE CT NW
MASSILLON, OH 44647
Capacity: 2000 Tank Status: Currently In Use
Install Date: 01/01/92
Content: Gasoline
Tank Type: Fiberglass Reinforced Plastic

B7 **MASSILLON CABLE TV INC** **FINDS 1005803123**
SSW **814 CABLE CT NW** **110006219163**
1/4-1/2 **MASSILLON, OH 44648**
1886 ft.
Higher **Site 2 of 2 in cluster B**

MASSILLON CABLE TV INC (Continued) **1005803123**

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Ohio Core database (OH_CORE)

8
NNE
1/4-1/2
1975 ft.
Higher

MASSILLON SEWER PIPE
340 LAKE AVE NW
MASSILLON, OH 44646

LUST **S104778960**
N/A

LUST:
Owner: PRICE BROTHERS CO.
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 76000116-N00001
Owner Address: PO BOX 825
DAYTON, OH 45409
FR Status: No Further Action letter issued
Old Facility Id: 760116
Former Lust Release Number: 764131000
Release Date: Not reported

9
ESE
1/4-1/2
2158 ft.
Higher

1 STATE AVE NW
MASSILLON, OH

OH Spills **S102483554**
N/A

SPILLS:
Facility ID: 19964--1787
Spill Date: 4/1996 Date Reported 04/30/96 13:58
Spill Number: 9604-76-1787
Size of Spill: Unknown Priority: No Response by Emergency Response
Cause: Discharge Reason: Undefined
Affected Area: Post-88 surface water
Material: SEWAGE
Type: Sewer bypasses, permit violations, septic waste, manure
Units: Not reported
Waterway Affctd: TUSCARAWAS RIVER
Spill Source: Fixed Facility, Public, Waste system
Reportable Qnty: Not reported
Name of Company or person that had spill: Not reported
Suspected Spiller:
MASSILLON WWTP
Carrier: Not reported

10
NNW
1/4-1/2
2386 ft.
Higher

AMVETS POST 12
653 EARL RD
MASSILLON, OH 44647

FINDS **1005803056**
110006218422

AMVETS POST 12 (Continued) **1005803056**

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Ohio Core database (OH_CORE)

11
NE
1/4-1/2
2476 ft.
Higher

FARINA MOTORS INC
1070 FIRST ST NE
MASSILLON, OH 44646

RCRIS-SQG **1000255570**
FINDS **OHD018170506**
LUST

RCRIS:
Owner: FARINA JAMES V
(312) 555-1212
EPA ID: OHD018170506
Contact: GEORGE KERECHANIN
(216) 837-9201
Classification: Small Quantity Generator
Used Oil Recyc: No
TSDF Activities: Not reported
Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Ohio Core database (OH_CORE)
Resource Conservation and Recovery Act Information system (RCRAINFO)

LUST:
Owner: COEN CO.
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 76000039-N00001
Owner Address: 1900 19TH ST NE
CANTON, OH 44714
FR Status: No Further Action letter issued
Old Facility Id: 760039
Former Lust Release Number: 762116200
Release Date: Not reported

12
NE
1/4-1/2
2502 ft.
Higher

MASSILLON WELL FIELD / UNKNOWN SOUR
CORNER OF RT 21 / LAKE AVE
MASSILLON, OH 44646

SHWS **S103686439**
DERR **N/A**

SHWS:
Facility ID: 276-1273
EPA ID: NOT ASSIGNED
Lat/Long: 40 48 45 / 81 31 45
Facility Type: None

DERR:
Facility Id: 276-1273
Lat/Long: 40 48 45 / 81 31 45
EPA ID: NOT ASSIGNED
Voluntary Action Program: False

13
SSE
1/4-1/2
2536 ft.
Higher

BUS GARAGE
220 CHERRY ST NW
MASSILLON, OH 44646

LUST **S104778947**
N/A

LUST:
Owner: MASSILLON BOARD OF EDUCATION
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 76000068-N00001
Owner Address: 207 OAK AVE SE
MASSILLION, OH 44646
FR Status: No Further Action letter issued
Old Facility Id: 760068
Former Lust Release Number: 762265100
Release Date: Not reported

14
NNE
1/4-1/2
2542 ft.
Higher

RON'S TRUCKING
1359 3RD ST NW
MASSILLON, OH 44646

UST **U001431980**
N/A

UST:
Facility ID: 76000201 Tank ID: T00001
Owner: RON HACKENBERGER
Owner Address: 4838 RT 250 N
NORWALK, OH 44857
Capacity: 8000 Tank Status: Currently In Use
Install Date: 07/01/87
Content: Diesel
Tank Type: Steel

15
SE
1/4-1/2
2639 ft.
Higher

MASSILLON PLAQUE CO
630 ERIE ST N
MASSILLON, OH 44648

RCRIS-SQG **1000382217**
FINDS **OHD004202826**

RCRIS:
Owner: DCC CORP
(312) 555-1212
EPA ID: OHD004202826
Contact: ANDREW DEUBLE
(216) 494-4199
Classification: Small Quantity Generator
Used Oil Recyc: No
TSDF Activities: Not reported
Violation Status: No violations found

MASSILLON PLAQUE CO (Continued) **1000382217**

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Resource Conservation and Recovery Act Information system (RCRAINFO)

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
MASSILLON	1001208990	MASSILLON, CITY OF	2695 ERIE AVENUE SOUTH	44646	MLTS
MASSILLON	S105245559	MASSILLON'S EARTH RETURN	FOURTEENTH AND INDUSTRIAL AVE SW	44647	SWF/LF
MASSILLON	S105245553	FEICHTER'S YARD WASTE	KENYON SW	44647	SWF/LF
MASSILLON	1000335966	EATON CORP	240 4TH ST NW	44646	RCRIS-SQG, FINDS, TRIS, CERC-NFRAP
MASSILLON	1004767024	CANTON ELEVATOR CO INC	647 THIRD ST	44647	RCRIS-SQG, FINDS
MASSILLON OHIO	S105245558	MASSILLON STP	2700 TREATMENT RD SW	44646	SWF/LF

EPA Waste Codes Addendum

Code	Description
D001	IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Elapsed ASTM days: Provides confirmation that this EDR report meets or exceeds the 90-day updating requirement of the ASTM standard.

FEDERAL ASTM STANDARD RECORDS

NPL: National Priority List
Source: EPA
Telephone: N/A
National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 10/24/02
Date Made Active at EDR: 12/09/02
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 11/04/02
Elapsed ASTM days: 35
Date of Last EDR Contact: 11/04/02

NPL Site Boundaries

Sources:

EPA's Environmental Photographic Interpretation Center (EPIC)
Telephone: 202-564-7333

EPA Region 1
Telephone 617-918-1143

EPA Region 3
Telephone 215-814-5418

EPA Region 4
Telephone 404-562-8033

EPA Region 6
Telephone: 214-655-6659

EPA Region 8
Telephone: 303-312-6774

Proposed NPL: Proposed National Priority List Sites
Source: EPA
Telephone: N/A

Date of Government Version: 10/24/02
Date Made Active at EDR: 12/09/02
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 11/04/02
Elapsed ASTM days: 35
Date of Last EDR Contact: 11/04/02

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System
Source: EPA
Telephone: 703-413-0223
CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 08/15/02
Date Made Active at EDR: 10/28/02
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 09/23/02
Elapsed ASTM days: 35
Date of Last EDR Contact: 09/23/02

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned
Source: EPA
Telephone: 703-413-0223
As of February 1995, CERCLIS sites designated "No Further Remedial Action Planned" (NFRAP) have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund action or NPL consideration. EPA has removed approximately 25,000 NFRAP sites to lift the unintended barriers to the redevelopment of these properties and has archived them as historical records so EPA does not needlessly repeat the investigations in the future. This policy change is part of the EPA's Brownfields Redevelopment Program to help cities, states, private investors and affected citizens to promote economic redevelopment of unproductive urban sites.

Date of Government Version: 09/15/02
Date Made Active at EDR: 10/28/02
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 10/03/02
Elapsed ASTM days: 25
Date of Last EDR Contact: 09/23/02

CORRACTS: Corrective Action Report
Source: EPA
Telephone: 800-424-9346
CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 09/29/02
Date Made Active at EDR: 12/26/02
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 10/15/02
Elapsed ASTM days: 72
Date of Last EDR Contact: 12/09/02

RCRIS: Resource Conservation and Recovery Information System
Source: EPA/NTIS
Telephone: 800-424-9346
Resource Conservation and Recovery Information System. RCRIS includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA).

Date of Government Version: 09/09/02
Date Made Active at EDR: 10/28/02
Database Release Frequency: Varies

Date of Data Arrival at EDR: 09/24/02
Elapsed ASTM days: 34
Date of Last EDR Contact: 09/24/02

ERNS: Emergency Response Notification System
Source: EPA/NTIS
Telephone: 202-260-2342
Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 12/31/01
Date Made Active at EDR: 07/15/02
Database Release Frequency: Varies

Date of Data Arrival at EDR: 07/02/02
Elapsed ASTM days: 13
Date of Last EDR Contact: 10/28/02

FEDERAL ASTM SUPPLEMENTAL RECORDS

BRS: Biennial Reporting System
Source: EPA/NTIS
Telephone: 800-424-9346
The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/99
Database Release Frequency: Biennially

Date of Last EDR Contact: 12/17/02
Date of Next Scheduled EDR Contact: 03/17/03

CONSENT: Superfund (CERCLA) Consent Decrees
Source: EPA Regional Offices
Telephone: Varies
Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: N/A
Database Release Frequency: Varies

Date of Last EDR Contact: N/A
Date of Next Scheduled EDR Contact: N/A

ROD: Records Of Decision
Source: EPA
Telephone: 703-416-0223
Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 12/21/01
Database Release Frequency: Annually

Date of Last EDR Contact: 10/07/02
Date of Next Scheduled EDR Contact: 01/06/03

DELISTED NPL: National Priority List Deletions
Source: EPA
Telephone: N/A
The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 10/18/02
Database Release Frequency: Quarterly

Date of Last EDR Contact: 11/04/02
Date of Next Scheduled EDR Contact: 02/03/03

FINDS: Facility Index System/Facility Identification Initiative Program Summary Report
Source: EPA
Telephone: N/A
Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 10/10/02
Database Release Frequency: Quarterly

Date of Last EDR Contact: 10/07/02
Date of Next Scheduled EDR Contact: 01/06/03

HMIRS: Hazardous Materials Information Reporting System
Source: U.S. Department of Transportation
Telephone: 202-366-4555
Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 07/31/02
Database Release Frequency: Annually

Date of Last EDR Contact: 10/21/02
Date of Next Scheduled EDR Contact: 01/20/03

MLTS: Material Licensing Tracking System
Source: Nuclear Regulatory Commission
Telephone: 301-415-7169
MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 10/21/02
Database Release Frequency: Quarterly

Date of Last EDR Contact: 10/08/02
Date of Next Scheduled EDR Contact: 01/06/03

MINES: Mines Master Index File
Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-5959

Date of Government Version: 09/10/02
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 09/30/02
Date of Next Scheduled EDR Contact: 12/30/02

NPL LIENS: Federal Superfund Liens
Source: EPA
Telephone: 205-564-4267
Federal Superfund Liens. Under the authority granted the USEPA by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner receives notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/91
Database Release Frequency: No Update Planned
Date of Last EDR Contact: 11/25/02
Date of Next Scheduled EDR Contact: 02/24/03

PADS: PCB Activity Database System
Source: EPA
Telephone: 202-564-3887
PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 09/20/02
Database Release Frequency: Annually
Date of Last EDR Contact: 11/13/02
Date of Next Scheduled EDR Contact: 02/10/03

RAATS: RCRA Administrative Action Tracking System
Source: EPA
Telephone: 202-564-4104
RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/95
Database Release Frequency: No Update Planned
Date of Last EDR Contact: 12/10/02
Date of Next Scheduled EDR Contact: 03/10/03

TRIS: Toxic Chemical Release Inventory System
Source: EPA
Telephone: 202-260-1531
Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/00
Database Release Frequency: Annually
Date of Last EDR Contact: 09/24/02
Date of Next Scheduled EDR Contact: 12/23/02

TSCA: Toxic Substances Control Act
Source: EPA
Telephone: 202-260-5521
Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/98
Database Release Frequency: Every 4 Years
Date of Last EDR Contact: 12/10/02
Date of Next Scheduled EDR Contact: 03/10/03

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
Source: EPA
Telephone: 202-564-2501

Date of Government Version: 10/24/02
Database Release Frequency: Quarterly
Date of Last EDR Contact: 09/24/02
Date of Next Scheduled EDR Contact: 12/23/02

SSTS: Section 7 Tracking Systems
Source: EPA
Telephone: 202-564-5008
Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/00
Database Release Frequency: Annually
Date of Last EDR Contact: 10/22/02
Date of Next Scheduled EDR Contact: 01/20/03

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-564-2501
FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 10/24/02
Database Release Frequency: Quarterly
Date of Last EDR Contact: 09/24/02
Date of Next Scheduled EDR Contact: 12/23/02

STATE OF OHIO ASTM STANDARD RECORDS

SHWS: Master Sites List
Source: Ohio Environmental Protection Agency
Telephone: 614-644-2068
The Master Sites List is comprised of sites in Ohio where there is evidence of, or it is suspected that waste management has resulted in the contamination of air, water, or soil and there is a confirmed or potential threat to human health or the environment. Please be advised that this report does not constitute a determination that any site identified in the report is or may be contaminated. The Ohio EPA no longer maintains or publishes the MSL.

Date of Government Version: 03/01/99
Date Made Active at EDR: 04/21/99
Database Release Frequency: No Update Planned
Date of Data Arrival at EDR: 03/29/99
Elapsed ASTM days: 23
Date of Last EDR Contact: 12/09/02

SWF/LF: Licensed Solid Waste Facilities
Source: Ohio Environmental Protection Agency
Telephone: 614-644-2621
Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 10/23/02
Date Made Active at EDR: 12/13/02
Database Release Frequency: Annually
Date of Data Arrival at EDR: 11/13/02
Elapsed ASTM days: 30
Date of Last EDR Contact: 11/13/02

LUST: Leaking Underground Storage Tank File
Source: Department of Commerce
Telephone: 614-752-7924
Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 08/18/02
Date Made Active at EDR: 10/18/02
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 09/16/02
Elapsed ASTM days: 32
Date of Last EDR Contact: 12/16/02

UST: Underground Storage Tank Tank File
Source: Department of Commerce
Telephone: 614-752-7938
Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 12/08/02
Date Made Active at EDR: 12/26/02
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 12/16/02
Elapsed ASTM days: 10
Date of Last EDR Contact: 12/16/02

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

VCP: Voluntary Action Program Sites
Source: Ohio EPA, Voluntary Action Program
Telephone: 614-644-2924
Site involved in the Voluntary Action Program.

Date of Government Version: 07/16/02
Date Made Active at EDR: 08/09/02
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 07/19/02
Elapsed ASTM days: 21
Date of Last EDR Contact: 12/10/02

STATE OF OHIO ASTM SUPPLEMENTAL RECORDS

SPILLS: Emergency Response Database
Source: Ohio EPA
Telephone: 614-644-2084
All reported incidents, spills or releases to the environment.

Date of Government Version: 12/31/99
Database Release Frequency: Varies

Date of Last EDR Contact: 12/11/02
Date of Next Scheduled EDR Contact: 03/10/03

DERR: Division of Emergency & Remedial Response's Database
Source: Ohio EPA, Div. of Emergency Response
Telephone: 614-644-3538
Sites that may or may not have contamination.

Date of Government Version: 06/01/02
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 12/16/02
Date of Next Scheduled EDR Contact: 03/17/03

EDR PROPRIETARY HISTORICAL DATABASES

Former Manufactured Gas (Coal Gas) Sites: The existence and location of Coal Gas sites is provided exclusively to EDR by Real Property Scan, Inc. For a technical description of the types of hazards which may be found at such sites, contact your EDR customer service representative.

Disclaimer Provided by Real Property Scan, Inc.

The information contained in this report has predominantly been obtained from publicly available sources produced by entities other than Real Property Scan. While reasonable steps have been taken to insure the accuracy of this report, Real Property Scan does not guarantee the accuracy of this report. Any liability on the part of Real Property Scan is strictly limited to a refund of the amount paid. No claim is made for the actual existence of toxins at any site. This report does not constitute a legal opinion.

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

Oil/Gas Pipelines/Electrical Transmission Lines: This data was obtained by EDR from the USGS in 1994. It is referred to by USGS as GeoData Digital Line Graphs from 1:100,000-Scale Maps. It was extracted from the transportation category including some oil, but primarily gas pipelines and electrical transmission lines.

Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1999 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 from the U.S. Fish and Wildlife Service.

STREET AND ADDRESS INFORMATION

GEOCHECK®- PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

WORLD KITCHEN, INC.
359 STATE STREET NW
MASSILLON, OH 44647

TARGET PROPERTY COORDINATES

Latitude (North):	40.806301 - 40° 48' 22.7"
Longitude (West):	81.532997 - 81° 31' 58.8"
Universal Tranverse Mercator:	Zone 17
UTM X (Meters):	455041.6
UTM Y (Meters):	4517180.0

EDR's GeoCheck Physical Setting Source Addendum has been developed to assist the environmental professional with the collection of physical setting source information in accordance with ASTM 1527-00, Section 7.2.3. Section 7.2.3 requires that a current USGS 7.5 Minute Topographic Map (or equivalent, such as the USGS Digital Elevation Model) be reviewed. It also requires that one or more additional physical setting sources be sought when (1) conditions have been identified in which hazardous substances or petroleum products are likely to migrate to or from the property, and (2) more information than is provided in the current USGS 7.5 Minute Topographic Map (or equivalent) is generally obtained, pursuant to local good commercial or customary practice, to assess the impact of migration of recognized environmental conditions in connection with the property. Such additional physical setting sources generally include information about the topographic, hydrologic, hydrogeologic, and geologic characteristics of a site, and wells in the area.

Assessment of the impact of contaminant migration generally has two principle investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata. EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

USGS TOPOGRAPHIC MAP ASSOCIATED WITH THIS SITE

Target Property: 2440081-G5 MASSILLON, OH
Source: USGS 7.5 min quad index

GENERAL TOPOGRAPHIC GRADIENT AT TARGET PROPERTY

Target Property: Undeterminable

Source: General Topographic Gradient has been determined from the USGS 1 Degree Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

Target Property County	FEMA Flood Electronic Data
STARK, OH	YES - refer to the Overview Map and Detail Map

Flood Plain Panel at Target Property: 3905170005C

Additional Panels in search area: 3907800085B
3907800080B
3905170002C
3907800100B

NATIONAL WETLAND INVENTORY

NWI Quad at Target Property	NWI Electronic Data Coverage
MASSILLON	Not Available

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

AQUIFLOW®

Search Radius: 2.000 Miles.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

MAP ID	LOCATION FROM TP	GENERAL DIRECTION GROUNDWATER FLOW
Not Reported		

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT **GEOLOGIC AGE IDENTIFICATION**

Era:	Paleozoic	Category:	Stratifed Sequence
System:	Pennsylvanian		
Series:	Atokan and Morrowan Series		
Code:	PP1 *(decoded above as Era, System & Series)*		

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps. The following information is based on Soil Conservation Service STATSGO data.

Soil Component Name:	CHILI
Soil Surface Texture:	silt loam
Hydrologic Group:	Class B - Moderate infiltration rates. Deep and moderately deep, moderately well and well drained soils with moderately coarse textures.
Soil Drainage Class:	Well drained. Soils have intermediate water holding capacity. Depth to water table is more than 6 feet.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Hydric Status: Soil does not meet the requirements for a hydric soil.

Corrosion Potential - Uncoated Steel: LOW

Depth to Bedrock Min: > 60 inches

Depth to Bedrock Max: > 60 inches

Soil Layer Information

	Boundary			Classification			
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil	Permeability Rate (in/hr)	Soil Reaction (pH)
1	0 inches	9 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 2.00 Min: 0.60	Max: 7.30 Min: 4.50
2	9 inches	35 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 6.00 Min: 2.00	Max: 6.50 Min: 4.50
3	35 inches	54 inches	very gravelly - sandy loam	Granular materials (35 pct. or less passing No. 200), Stone Fragments, Gravel and Sand.	COURSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand.	Max: 6.00 Min: 2.00	Max: 6.50 Min: 5.10
4	54 inches	60 inches	stratified	Granular materials (35 pct. or less passing No. 200), Stone Fragments, Gravel and Sand.	COURSE-GRAINED SOILIS, Gravels, Clean Gravels, Well-graded gravel.	Max: 20.00 Min: 6.00	Max: 7.80 Min: 5.10

OTHER SOIL TYPES IN AREA

Based on Soil Conservation Service STATSGO data, the following additional subordinant soil types may appear within the general area of target property.

Soil Surface Textures: loam
sandy loam
gravelly - loam

Surficial Soil Types: loam
sandy loam
gravelly - loam

Shallow Soil Types: silt loam
sandy loam

Deeper Soil Types: silt loam

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

ADDITIONAL ENVIRONMENTAL RECORD SOURCES

According to ASTM E 1527-00, Section 7.2.2, "one or more additional state or local sources of environmental records may be checked, in the discretion of the environmental professional, to enhance and supplement federal and state sources... Factors to consider in determining which local or additional state records, if any, should be checked include (1) whether they are reasonably ascertainable, (2) whether they are sufficiently useful, accurate, and complete in light of the objective of the records review (see 7.1.1), and (3) whether they are obtained, pursuant to local, good commercial or customary practice." One of the record sources listed in Section 7.2.2 is water well information. Water well information can be used to assist the environmental professional in assessing sources that may impact groundwater flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

WELL SEARCH DISTANCE INFORMATION

DATABASE	SEARCH DISTANCE (miles)
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

FEDERAL USGS WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
No Wells Found		

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

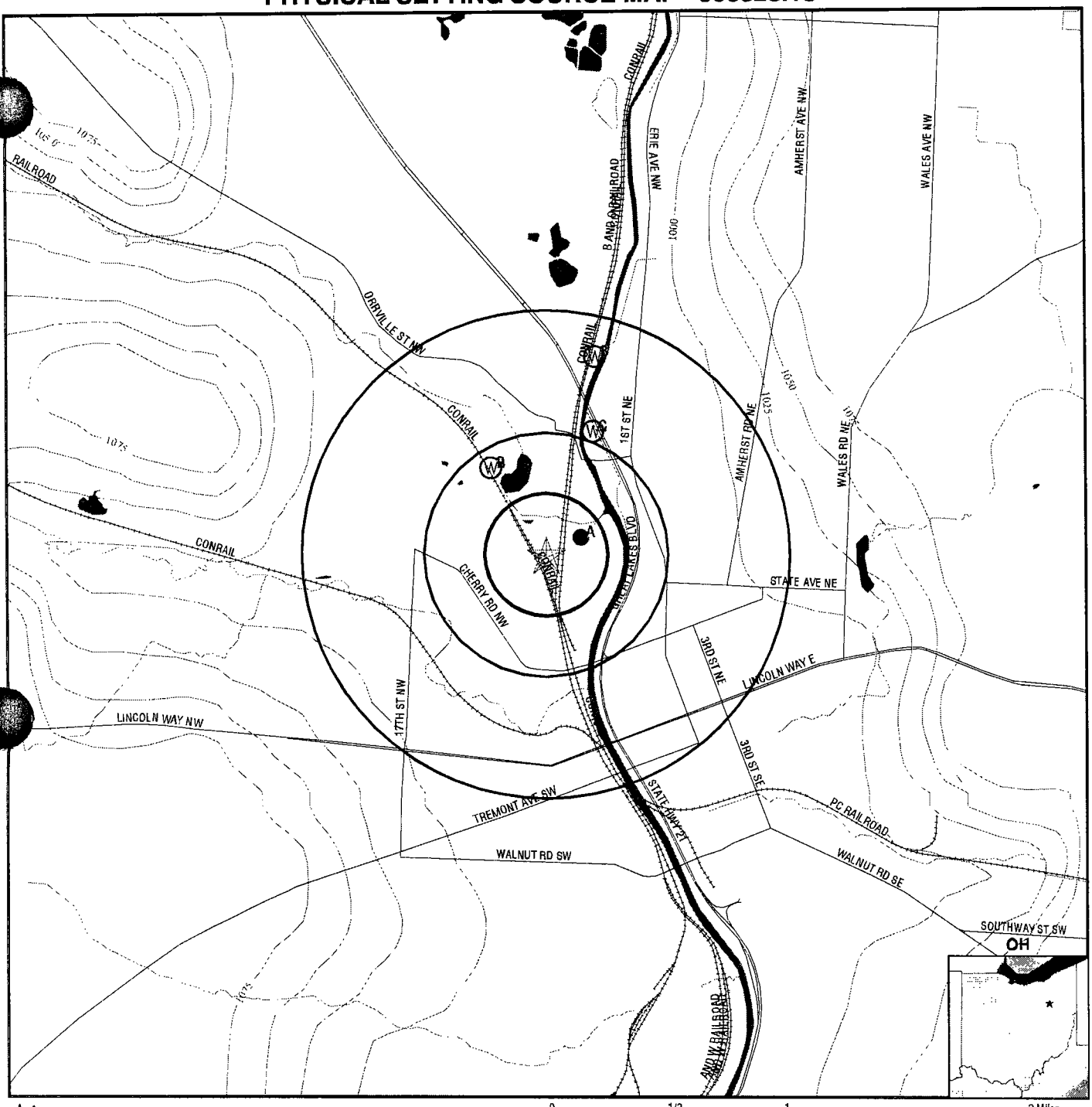
MAP ID	WELL ID	LOCATION FROM TP
A2	OH7604511	1/8 - 1/4 Mile NE

Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
A1	OHSTU03720	1/8 - 1/4 Mile East
B3	OHSTU03876	1/4 - 1/2 Mile NNW
B4	OHWELL6591	1/4 - 1/2 Mile NNW
C5	OHWELL6433	1/2 - 1 Mile NNE
C6	OHWELL6431	1/2 - 1 Mile NNE
C7	OHWELL6432	1/2 - 1 Mile NNE
8	OHWELL6434	1/2 - 1 Mile NNE

PHYSICAL SETTING SOURCE MAP - 906528.1s



- County Boundary
- Major Roads
- Contour Lines
- Water Wells
- Public Water Supply Wells
- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location
- Cluster of Multiple Icons

Earthquake epicenter, Richter 5 or greater

TARGET PROPERTY:	World Kitchen, Inc.	CUSTOMER:	Weston Solutions, Inc.
ADDRESS:	359 State Street NW	CONTACT:	David Lis
CITY/STATE/ZIP:	Massillon OH 44647	INQUIRY #:	906528.1s
LAT/LONG:	40.8063 / 81.5330	DATE:	January 07, 2003 7:06 am

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
A1 **East** **1/8 - 1/4 Mile** **Higher**	**OH WELLS**	**OHSTU03720**

Database:	Ohio Source Treatment Unit		
Pws_id:	7604512	Cpid:	38375
Cp_name:	Consumers Ohio Water Stark Reg		
Watsysname:	COWC - Stark Region		
Sourcetype:	Ground Water	Status:	Active
Latitude:	40.80655	Longitude:	-81.53018
Hor_acc:	5	H_unit:	meters
H_meth_col:	GPS Code Measurements (Pseudo Range) Differential		
Sys_type:	COMM		
Serv_area:	Residential		
County:	Stark		

	Database	EDR ID Number
A2 **NE** **1/8 - 1/4 Mile** **Higher**	**FRDS PWS**	**OH7604511**

PWS ID:	OH7604511	PWS Status:	Active
Date Initiated:	7706	Date Deactivated:	Not Reported
PWS Name:	OH.WATER SER.CO.,MASSILLON MANAGER,123 THIRD STREET,SE MASSILLON, OH 44648		
Addressee / Facility:	System Owner/Responsible Party OH.WATER SER.CO.,MASSILLON PRES.,6650 SOUTH AVENUE POLAND, OH 44514		
Facility Latitude:	40 48 29	Facility Longitude:	081 31 50
Facility Latitude:	40 48 45	Facility Longitude:	081 31 46
City Served:	MASSILLON		
Treatment Class:	Treated	Population:	00060000

PWS currently has or had major violation(s) or enforcement: No

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	Database	EDR ID Number
B3 **NNW** **1/4 - 1/2 Mile** **Higher**	**OH WELLS**	**OHSTU03876**

Database:	Ohio Source Treatment Unit		
Pws_id:	7663412	Cpid:	38055
Cp_name:	Amvets Post 12		
Watsysname:	Amvets Post 12		
Sourcetype:	Ground Water	Status:	Active
Latitude:	40.81146	Longitude:	-81.53731
Hor_acc:	1	H_unit:	meters
H_meth_col:	GPS Code Measurements (Pseudo Range) Differential		
Sys_type:	TNC		
Serv_area:	Restaurant/Drive-in/Bar		
County:	Stark		

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
B4 **NNW** **1/4 - 1/2 Mile** **Higher**	**OH WELLS**	**OHWELL6591**

Database:	Ohio Public Wells		
Pws_id:	7663412	Cpid:	119069
Cp_name:	Amvets Post 12 WELL 0001		
Watsysname:	Amvets Post 12		
Potc_type:	WELL	Status:	A
County:	Stark	Latitude:	40.81148
Longitude:	-81.53727	Hor_acc:	1
H_unit:	meters	H_meth_col:	GPS Code Measurements (Pseudo Range) Differential
Sys_type:	TNC		
Serv_area:	Restaurant/Drive-in/Bar		

	Database	EDR ID Number
C5 **NNE** **1/2 - 1 Mile** **Higher**	**OH WELLS**	**OHWELL6433**

Database:	Ohio Public Wells		
Pws_id:	7604512	Cpid:	117884
Cp_name:	Consumers Ohio Water-Sta WELL 0003		
Watsysname:	COWC - Stark Region		
Potc_type:	WELL	Status:	A
County:	Stark	Latitude:	40.81328
Longitude:	-81.52903	Hor_acc:	5
H_unit:	meters	H_meth_col:	GPS Code Measurements (Pseudo Range) Differential
Sys_type:	COMM		
Serv_area:	Residential		

	Database	EDR ID Number
C6 **NNE** **1/2 - 1 Mile** **Higher**	**OH WELLS**	**OHWELL6431**

Database:	Ohio Public Wells		
Pws_id:	7604512	Cpid:	117880
Cp_name:	Consumers Ohio Water-Sta WELL 0001		
Watsysname:	COWC - Stark Region		
Potc_type:	WELL	Status:	A
County:	Stark	Latitude:	40.81359
Longitude:	-81.52923	Hor_acc:	5
H_unit:	meters	H_meth_col:	GPS Code Measurements (Pseudo Range) Differential
Sys_type:	COMM		
Serv_area:	Residential		

	Database	EDR ID Number
C7 **NNE** **1/2 - 1 Mile** **Higher**	**OH WELLS**	**OHWELL6432**

Database:	Ohio Public Wells		
Pws_id:	7604512	Cpid:	117882
Cp_name:	Consumers Ohio Water-Sta WELL 0002		
Watsysname:	COWC - Stark Region		
Potc_type:	WELL	Status:	A
County:	Stark	Latitude:	40.81403
Longitude:	-81.52959	Hor_acc:	5
H_unit:	meters	H_meth_col:	GPS Code Measurements (Pseudo Range) Differential
Sys_type:	COMM		
Serv_area:	Residential		

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

Database	EDR ID Number
OH WELLS	**OHWELL6434**

8
NNE
1/2 - 1 Mile
Higher

Database:	Ohio Public Wells		
Pws_id:	7604512	Cpid:	117886
Cp_name:	Consumers Ohio Water-Sta WELL 0005		
Watsysname:	COWC - Stark Region		
Potc_type:	WELL	Status:	A
County:	Stark	Latitude:	40.81804
Longitude:	-81.52911	Hor_acc:	5
H_unit:	meters	H_meth_col:	GPS Code Measurements (Pseudo Range) Differential
Sys_type:	COMM		
Serv_area:	Residential		

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS
RADON

AREA RADON INFORMATION

Federal EPA Radon Zone for STARK County: 1

Note: Zone 1 indoor average level > 4 pCi/L.
: Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
: Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for STARK COUNTY, OH

Number of sites tested: 43

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	3.325 pCi/L	75%	25%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	5.830 pCi/L	53%	42%	5%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

HYDROLOGIC INFORMATION

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1999 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 from the U.S. Fish and Wildlife Service.

HYDROGEOLOGIC INFORMATION

AQUIFLOW[R] Information System
Source: EDR proprietary database of groundwater flow information
EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit
Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database
The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the national Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

ADDITIONAL ENVIRONMENTAL RECORD SOURCES

FEDERAL WATER WELLS

PWS: Public Water Systems
Source: EPA/Office of Drinking Water
Telephone: 202-260-2805
Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data
Source: EPA/Office of Drinking Water
Telephone: 202-260-2805
Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: In November 1971 the United States Geological Survey (USGS) implemented a national water resource information tracking system. This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on more than 900,000 wells, springs, and other sources of groundwater.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STATE RECORDS

Public Water System Data
Source: Ohio Environmental Protection Agency
Telephone: 614-644-3677
The database includes community, transient noncommunity and nontransient noncommunity water wells; and source treatment unit locations.

RADON

Area Radon Information
Source: USGS
Telephone: 303-202-4210
The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

EPA Radon Zones
Source: EPA
Telephone: 202-564-9370
Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Epicenters: World earthquake epicenters, Richter 5 or greater
Source: Department of Commerce, National Oceanic and Atmospheric Administration

U.S. Department of Justice

Environment and Natural Resources Division

Environmental Enforcement Section
P.O. Box 7611 Telephone: (202) 305-2332
Washington, D.C. 20044-7611 Facsimile: (202) 616-6584

BSG:JLJ
DJ No. 90-7-1-07955

13 December 2002

Richard M. Cieri
Jeffrey B. Ellman
Carl E. Black
Jones, Day, Reavis & Pogue
North Point
901 Lakeside Avenue
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Henry L. Gompf
Jones, Day, Reavis & Pogue
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Re: In re World Kitchen, Inc., Case No. 02-B21257

Dear Counsel:

We are writing to raise a number of concerns we have about the Debtors' Proposed Second Amended Joint Plan of Reorganization. We would like to resolve these issues with the Debtors, if possible, in order to avoid having to file an objection to the Plan.

We have concerns about provisions of Sections IV.A., IV.E.2.a., X.A.1, X.A.2., X.B.1, and X.B.2 of the Plan relating to any discharge of claims, release of liabilities, and revesting of property free of claims. We are concerned that language in these provisions may be contended to discharge and enjoin claims or rights of the U.S. Environmental Protection Agency that may arise or spring anew after the effective date of confirmation of the Plan. *See generally*, In re CMC Heartland Partners, 966 F.2d 1142 (7th Cir. 1992); In re Chicago, Milwaukee, St. Paul & Pacific R.R., 3 F.3d 200 (7th Cir. 1993) (holding that a CERCLA claim arises when the claimant can tie the bankruptcy debtor to a known release that the claimant knows will lead to CERCLA response costs, and when the claimant has conducted tests with regard to the contamination problem); *see also*, 11 U.S.C. § 1141(d)(1). The above-referenced cases explain that language similar to that which is currently contained in this Plan fails to recognize well established limits on discharge with respect to contaminated property owned or operated by a reorganized debtor and claims arising after confirmation of a Plan.

Reorganized Debtors or successors in interest owning contaminated property should not be permitted to own or operate property without having to comply with applicable environmental laws - and regardless of whether the contamination was caused prior to confirmation of the Plan. *See* In re CMC Heartland Partners, 966 F.2d 1142 (7th Cir. 1992); Ohio v. Kovacs, 469 U.S. 274, 285 (1985) (a debtor plainly may not maintain a nuisance, pollute the waters of the State or refuse to remove the source of such conditions).

Finally, the current language is also improper under bankruptcy and non-bankruptcy law because it may be contended to discharge environmental obligations or equitable remedies that are not subject to discharge under the Bankruptcy Code. *See* In re Torwico Electronics, Inc., 8 F.3d 146(3d Cir. 1993), *cert. denied*, 114 S. Ct. 1576 (1994); 11 U.S.C. § 101(5) (defining "claims" that are subject to discharge under 11 U.S.C. § 1141 and discharging them from certain equitable remedies that are not dischargeable).

In order to resolve these issues, we propose the following language be included in the Confirmation Order or in a modified Plan:

"Nothing in this Order or in the Second Amended Joint Plan of Reorganization shall discharge, release, or preclude any Claim that the U.S. EPA or any state environmental agency may have against the Debtors that has not arisen as of the Effective Date of this Confirmation Order. Nor shall this Order or Second Amended Joint Plan of Reorganization discharge, release, or preclude any remedy of the U.S. EPA or any state environmental agency that is not within the definition of a claim, as set forth in Section 101(5) of the Bankruptcy Code."

We also have concerns about language in Section XII.B. (Limitation of Liability) of the Plan that purports to release the Debtors and numerous non-debtors from certain liability for any act or omission in connection with the bankruptcy case, distribution of the Debtors' property, and the Debtors' administration of the Plan (with certain exceptions). There is no basis to release liability of non-debtors for conduct of the business during and after the case. *See* Union Carbide Corp. v. Newboles, 686 F.2d 593 (7th Cir. 1982); In re Dow Corning Corp., 280 F.3d 648 (6th Cir. 2002). Additionally, the language is overbroad and could be misconstrued to disallow valid administrative expense claims against the Debtors (including claims for attorney's fees) and valid ordinary course liabilities of the Reorganized Debtor incurred in carrying on its business contemplated under the Plan or in operating property distributed under the Plan.

In order to resolve these issues, we propose the following language be included in the Confirmation Order: "The provisions of Section XII.B. shall not apply to liabilities under environmental laws."

Thank you for your consideration of these requests. We would appreciate your response to these proposed language modifications sufficiently in advance of the deadline for filing of objections to the Plan.

Sincerely,

Jennifer A. Lukas-Jackson
Trial Attorney

cc: John Wheeler, Esq., EPA Headquarters
Christine Liszewski, Esq., EPA Region 5

Weston Solutions, Inc.
1400 Weston Way
P.O. Box 2653
West Chester, Pennsylvania 19380
610-701-3000 • Fax 610-701-3186
www.westonsolutions.com

10 December 2002

Mr. Kenneth Bardo
Project Manager
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: World Kitchen, Massillon, Ohio, Facility
U.S. EPA I.D. No. OHD 045-205-424
Revised Pages for COPR Volume 3

Dear Mr. Bardo:

On behalf of Wyeth and World Kitchen, Inc. (WKI), Weston Solutions, Inc. (WESTON®) submitted two copies of the Consent Order Plans and Reports (COPR), Volume 3, to the U.S. EPA on 19 November 2002. Volume 3 consists of the:

- Remediation Design Report (RDR)

WESTON received comments on the COPR, Volume 3, from the U.S. EPA on 29 November 2002. As per our phone conversation yesterday, two copies of responses to the comments and revised pages for the COPR, Volume 3, are attached to this letter. These revised pages replace the original pages of the Remediation Design Report.

If you have any questions or comments regarding this submittal, please contact me at (610) 701-7360 or Mr. Matthew Basso at (973) 683-2273.

Very truly yours,

WESTON SOLUTIONS, INC.

Thomas Cornuet

Thomas S. Cornuet, P.G.
Project Manager

Attachment
cc: M. Basso, Wyeth
J. Burman, WKI
L. Bove, WESTON
J. Savage, WESTON

KEN BARDO
<kbardo@prodigy.net
>

11/29/02 02:07 PM

To: bassom@wyeth.com, tom.cornuet@westonsolutions.com
cc: karen.nesbit@epa.state.oh.us
Subject: Remediation Design Report Comments

Here are my comments on the Remediation Design Report (Volume 3 of 4) for the World Kitchen project. I am available next week if you have any questions. - Ken

WKI Volume 3 Comments

Resent 12/2/02

Kenneth Bardo
11/25/02 03:39 PM

To: cornuett@mail.rfweston.com
cc:
Subject: Cost Estimate

When you say that the costs are based on the CMS and the CMS Addendum, are these the same costs as previously developed in the CMS in 1993 and 1994? If so, have they been adjusted for inflation or changed to reflect specific requirements in the CMI Scope of Work? For the record, it would be helpful to provide updated costs specifically detailing each task for the three remedial components. - Ken

Weston Solutions, Inc.
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22 November 2002

Mr. Kenneth Bardo
Project Manager
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: World Kitchen, Massillon, Ohio, Facility
U.S. EPA I.D. No. OHD 045-205-424
Cost Estimate to Complete Project

Dear Mr. Bardo:

On behalf of Wyeth and World Kitchen, Inc. (WKI), Weston Solutions, Inc. (WESTON®) is submitting to the U.S. EPA for review and approval an estimate of the cost to complete the work to be performed pursuant to the Consent Order for this project, executed on 26 August 2002. The current cost estimate to complete this work is $5,370,700 and consists of the following soil and groundwater corrective measures:

▪ Soil remediation beneath the building (IS-2)	$771,000
▪ Soil remediation outside the building (OS-3)	$1,340,000
▪ Groundwater remediation (GW-6)	$3,259,700
▪ Total Project Cost Estimate	$5,370,700

This cost estimate is based on the Corrective Measures Study (November 1993) and the Corrective Measures Study Addendum (July 1994). This is the same cost estimate that was submitted to the U.S. EPA on 9 October 2002 in the Project Management Plan for this project. This submission meets the schedule and content requirements of the Consent Order set forth in Paragraphs 27 and 39e. After U.S. EPA approval of the Final Remedy Construction Completion Report, Wyeth may submit to the U.S. EPA for review and approval a revised cost estimate to complete the remaining work to be performed pursuant to the Consent Order.

If you have any questions or comments regarding this submittal, please contact me at (610) 701-7360 or Mr. Matthew Basso at (973) 683-2273.

Very truly yours,

WESTON SOLUTIONS, INC.

Thomas Cornuet

Thomas S. Cornuet, P.G.
Project Manager

Attachment
cc: M. Basso, Wyeth
J. Burman, WKI
L. Bove, WESTON
T. Stevens, WESTON

Weston Solutions, Inc.
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7 November 2002

Mr. Kenneth Bardo
Project Manager
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: World Kitchen, Massillon, Ohio, Facility
U.S. EPA I.D. No. OHD 045-205-424
Revised Pages for COPR Volume 2

Dear Mr. Bardo:

On behalf of Wyeth and World Kitchen, Inc. (WKI), Weston Solutions, Inc. (WESTON®) submitted two copies of the Consent Order Plans and Reports (COPR), Volume 2, to the U.S. EPA on 23 October 2002. The plans provided in Volume 2 included:

- Quality Assurance Project Plan (QAPP)
- Sampling and Analysis Plan (SAP)
- Health and Safety Plan (HASP)

WESTON received comments on the COPR, Volume 2, from the U.S. EPA on 28 October 2002. Two copies of responses to the comments and revised pages for the COPR, Volume 2, are attached to this letter. These revised pages replace the original pages of the respective plans.

If you have any questions or comments regarding this submittal, please contact Tom Cornuet at (610) 701-7360 or Mr. Matthew Basso at (973) 683-2273.

Very truly yours,

WESTON SOLUTIONS, INC.

Thomas S. Cornuet, P.G.
Project Manager

Attachment
cc: M. Basso, Wyeth
J. Burman, WKI
L. Bove, WESTON
T. Stevens, WESTON

"Cornuet, Thomas" <Tom.Cornuet@westonsolutions.com>

To: Kenneth Bardo cc: "Matt Basso (E-mail)", "Jeff Burman (E-mail)", "Cor
Subject: WKI Air Stripper

11/07/02 04:27 PM

Ken,

Yesterday the WKI facility shut down the air stripper system because their latest effluent sampling results indicated that it was experiencing break through of VOCs. We contacted Ohio Drilling who constructed and maintains the air stripper system and they inspected the air stripper packing material today. Their inspection indicated that the packing is clogged and needs to be replaced for it to operate properly. We have asked them to order the packing material and schedule the air stripper packing maintenance as soon as possible. They expect to obtain and install the new packing material within the next two weeks. We will keep you updated on the progress of the maintenance activities and include a description all maintenance activities in our next Quarterly Progress Report scheduled for February 2003.

Tom Cornuet, P.G.
Weston Solutions, Inc.
1400 Weston Way
West Chester, PA 19380
ph: 610.701.7360
fax: 610.701.7401

Kenneth Bardo

10/28/02 09:43 AM

To: bassom@wyeth.com, burmanjl@worldkitchen.com, tom.cornuet@westonsolutions.com

cc:

Subject: Work Plans

Gentlemen - Attached are EPA comments on Volume 2 of 4 of the Consent Order Plans. The plans were submitted on October 23, 2002. Please make the necessary changes to address EPA comments and place a final copy of the plans in the Massillon Library. If you have any questions regarding the comments, let me know. - Ken

World Kitchen Volume 2 Commen

October 28, 2002

EPA Comments on WKI October 2002 Plans, Volume 2 of 4

- On page 1-7 of the QAPP, the use of "(COPR, Vol. 1)" is confusing. Please cite as "Consent Order Plans and Reports (COPR), Volume 1 of 4" first, then use the COPR acronym.

- Table 1.1 lists two detection limits for vinyl chloride. Ensure that vinyl chloride can be quantified down to its MCL (2 µg/l).

- In Section 1.4.1, cite Figure 1-2 as being found at page 1-5.

- "D" is defined but not used in Table 3-1.

- Tables 4-1 and 7-1 provide a complete list of organic and inorganic parameters. However, only volatile analysis is expected to be performed during the remedy implementation. The tables should be project-specific.

- On page 1-9 of the SAP, replace "conservative action levels" with "Maximum Contaminant Levels" and modify the text as was performed for Section 2.2 of the ICP.

- On page 3-2 of the SAP, cite Table 1.1 (page 1-7) rather than Subsection 1.4.1.

Responses to U.S. EPA Comments on the
World Kitchen, Inc. Massillon Ohio Facility (ID # OHD 045-205-424)
Consent Order Plans and Reports Volume 2 of 4
Received on 28 October 2002

U.S. EPA Comment No. 1: *On page 1-7 of the QAPP, the use of "(COPR, Vol. 1)" is confusing. Please cite as "Consent Order Plans and Reports (COPR), Volume 1 of 4" first, then use the COPR acronym.*

Response: Page 1-7 of the QAPP was revised accordingly.

U.S. EPA Comment No. 2: *Table 1-1of the QAPP lists two detection limits for vinyl chloride. Ensure that vinyl chloride can be quantified down to its MCL (2 µg/l).*

Response: Table 1-1 of the QAPP was revised accordingly.

U.S. EPA Comment No. 3: *In Section 1.4.1 of the QAPP, cite Figure 1-2 as being found at page 1-5.*

Response: Section 1.4.1 (page 1-10) of the QAPP was revised accordingly.

U.S. EPA Comment No. 4: *"D" is defined but not used in Table 3-1 of the QAPP.*

Response: Table 3-1 of the QAPP and subsequent page numbers were revised accordingly.

U.S. EPA Comment No. 5: *Tables 4-1 and 7-1 of the QAPP provide a complete list of organic and inorganic parameters. However, only volatile analysis is expected to be performed during the remedy implementation. The tables should be project-specific.*

Response: Tables 4-1 and 7-1, and page 1-11 of the QAPP, and subsequent page numbers were revised accordingly.

U.S. EPA Comment No. 6: *On page 1-9 of the SAP, replace "conservative action levels" with "Maximum Contaminant Levels" and modify the text as was performed for Section 2.2 of the ICP.*

Response: Page 1-9 of the SAP was revised accordingly.

U.S. EPA Comment No. 7: *On page 3-2 of the SAP, cite Table 1.1 (page 1-7) rather than Subsection 1.4.1.*

Response: Page 3-2 and subsequent page numbers of the SAP were revised accordingly.

WESTON Comment: Table 1-1 on page 1-7 of the SAP was not referenced in the text.

Response: Page 1-7 of the SAP was revised accordingly.

EPA Comments on WKI Remediation Design Report (Volume 3 of 4)

1. Section 3.4.1, page 3-5: If accurate representation of the physical characteristics of the borehole is needed, continuous split-spoon sampling should be performed rather than relying on auger cuttings.

2. Section 3.4.1, page 3-7: Based on the data presented in Figure A-5, it appears that Primary Treatment Area 2 shown in Drawing 102 should be moved approximately 10-feet to the south toward SB-15-00. This adjustment of SVE vents will better encompass the contaminated area identified at SB-16-00.

3. Section 3.4.4.3, page 3-14: Development of a pulsing schedule is limited by the downtime of recovery wells W-1 and W-10 depicted in Table A-5. Historically, and more recently, it is not uncommon for the recovery wells to be down from 1 to 4 months. A more reliable pumping schedule needs to be developed by minimizing uncontrolled downtime. This should include an analysis of the reasons for the downtime and an upgrading of the O&M procedures to minimize uncontrolled downtime.

   There is no defined time frame for determining the pulsing schedule other than it will become part of the O&M Plan which is not due until November 2003. A pulsing schedule should be developed and initiated as soon as possible to begin this component of the groundwater corrective measure alternative. The final pulsing schedule, as modified based on operating history, can then be developed and placed in the O&M Plan, subject to EPA approval.

4. Section 4, page 4-1: All cuttings and soils generated from the installation of the SVE and sparge systems must be containerized, properly characterized, and disposed in accordance with applicable regulations. A TCLP analysis will be necessary to properly characterize the remediation waste.

5. Section 5, page 5-1: Copy EPA on all state permit applications.

Kenneth Bardo

10/21/02 01:28 PM

To: bassom@wyeth.com, burmanjl@worldkitchen.com, tom.cornuet@westonsolutions.com

cc:

Subject: Work Plans

Gentlemen - Attached are EPA comments on Volume 1 of 4 of the Consent Order Plans. The plans were submitted on October 9, 2002. Please make the necessary changes to address EPA comments and place a final copy of the plans in the Massillon Library. If you have any questions regarding the comments, let me know. - Ken

World Kitchen Plan Comment

October 21, 2002

EPA Comments on World Kitchen October 2002 Plans

- In Section 1.1 of the Project Management Plan (PMP), Data Management Plan (DMP), and Community Relations Plan (CRP), the correct reporting requirements to fulfill the Consent Order are set forth in paragraph 15 of Section VI, and Section 2 and Table 1 of Attachment 2.

- In Section 2.1 of the PMP and Section 4 of the CRP, the correct EPA e-mail address is bardo.kenneth@epa.gov.

- In Section 2 of the CRP, page 2-1 states that the air stripper was installed in February 1985, while Table 2-1 sets the date at February 1986. Please correct this discrepancy.

- The Fact Sheet presented in Appendix A of the CRP appears to be an update of EPA's cleanup plan made available at the 1996 public meeting. The fact sheet should not appear to be an EPA product. Modify the fact sheet to present a Wyeth and World Kitchen product. For additional information on the project, you can provide the pertinent contacts listed in Section 2 of the PMP. Please provide a revised fact sheet that addresses this comment before finalizing for distribution.

- The CRP should also describe the procedures to comply with the notification requirements found at paragraph 25(a) of the Consent Order.

- In Section 5 of the CRP, ensure that all EPA-approved plans and reports are placed in the information repository (e.g., *Operation and Maintenance Plan, Final Remedy Construction Completion Report, Validated Groundwater Data Report, Groundwater Remediation and Monitoring Report, Validated Air Sparging Data Report, Groundwater Air Sparging Report, and Soil Remediation Report*).

- In Section 6 of the CRP, fact sheets should also be mailed to adjacent landowners and the local government, in addition to placement in the information repository.

- In Section 2.2 of the Institutional Controls Plan (ICP), replace "conservative action levels" with "Maximum Contaminant Levels". In addition to stating that the contaminant concentrations are "either below or approaching their respective MCLs", provide the most recent concentrations detected at pumping production wells W-1 and W-10 (e.g., September 2002, TCE = 0.090 mg/l, cis-1,2-DCE = 0.095 mg/l, 1,1,1-TCA = 0.280 mg/l, trans-1,2-DCE = <0.005 mg/l, vinyl chloride = <0.005 mg/l, and 1,1-DCE = <0.005 mg/l).

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21 June 2001

Mr. Kenneth Bardo
Project Manager
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: EKCO/World Kitchen, Massillon, Ohio, Facility
U.S. EPA ID No. OHD 045-205-424
1,1-DCA and 1,2-DCA Groundwater Performance Standard

Dear Mr. Bardo:

On behalf of our client, American Home Products Corporation (AHPC), we would like to request a modification to the proposed list of Groundwater Performance Standards for the EKCO facility provided in the attachment to the Final Decision and Corrective Measures Implementation Order, dated 23 April 2001. Specifically, we would like to have the groundwater contaminants 1,1-dichloroethane (1,1-DCA) and 1,2-dichloroethane (1,2-DCA) removed from the list, and we are providing the following rationale to support our request:

- The two compounds were not included in the original Corrective Measures Study (CMS), dated November 1993, the CMS First Addendum, dated July 1994, nor in the draft Statement of Basis (S.B.), dated September 1996. Therefore, we believe they should not be added at this time.
- The 2000 groundwater sampling results show that 1,2-DCA is no longer present at the site, and the 1,1-DCA detected at the site is at concentrations significantly below the performance standard (810 µg/L).
- The compound 1,2-DCA has widespread industrial and commercial applications, including use as an anti-knock agent in gasoline, a pickling agent, a fumigant, and a dry-cleaning agent. It has also found use in photography, xerography, water softening, and in the production of adhesives, cosmetics, and varnishes (see Handbook of Toxic and Hazardous Chemicals, 1981). Because of its multiple uses, this compound has many sources and is potentially used by manufacturers that are neighboring to EKCO.
- The compound 1,2-DCA is not a degradation product of either of the principal site-related contaminants, 1,1,1-trichloroethane (TCA) or trichloroethene (TCE), and, therefore, is not likely to be related to site activities.
- All site groundwater is currently being contained on-site by the pumping of production wells W-1 and W-10.

We appreciate your consideration of this request and look forward to hearing from you soon. If you should have any questions, please feel free to contact me at (610) 701-7360.

Very truly yours,

ROY F. WESTON, INC.

Thomas Cornuet

Thomas S. Cornuet, P.G.
Project Manager

cc: M. Basso, AHPC
G. Smith, AHPC
J. Burman, EKCO
L. Bove, WESTON
T. Stevens, WESTON

AMERICAN HOME PRODUCTS CORPORATION
FIVE GIRALDA FARMS, MADISON, NEW JERSEY 07940, (201) 660-5000

September 24, 1996

ENVIRONMENT & SAFETY

Ms. Cheryl L. Allen
Community Involvement Coordinator
U.S. EPA Region 5
Office of Public Affairs
77 West Jackson Blvd.
Chicago, IL 60604

Mr. R. Smith
U.S. EPA Region 5
77 W. Jackson Blvd.
5-DRE-8J
Chicago, IL 60604

Dear Ms. Allen and Mr. Smith:

Re: EKCO Housewares, Massillon, Ohio

American Home Products Corporation agrees with the selected remedial alternatives as they are outlined in the Draft Statement of Basis (SB) and the final Corrective Measures Study (CMS) for the EKCO Housewares facility in Massillon, Ohio. However, we believe there are some statements in the draft SB that should be revised in order to more accurately represent the findings of the RCRA Facility Investigation (RFI) and the CMS. These issues are briefly discussed below. Figures from the final CMS which support our discussion are also attached.

Page 2, Paragraph 5--*The results of these studies are as follows: ...A nearby municipal well was contaminated.*

Page 5, Paragraph 4--*In September 1987, a groundwater quality assessment for the facility was conducted...sample all on-site wells and the contaminated municipal well (OWS-4)...*

AHPC would like to clarify that the source of the municipal well contamination has never been determined. No data have been collected that indicate any off-site migration of contaminated groundwater is occurring or has occurred. As explained below, the EKCO recovery wells (W-1 and W-10) currently draw water from the deep unit toward the site preventing off-site migration of groundwater. The EKCO facility has used its on-site W wells for production since the 1940s to supply the plant with its water needs. The historical pumpage of these wells would have induced flow conditions similar to current conditions at the site and prevented off-site migration of groundwater.

Figure 4 (attached) shows that the extent of the glacial valley from which OWS draws its groundwater extends throughout the industrial Massillon area. It can be seen in this figure that within the glacial valley there are abundant potential sources of VOCs to the groundwater. Industrial facilities located within the glacial valley are much more likely sources of the contamination found at the OWS-4 well than the EKCO facility, which is located west of the glacial valley and has a pumping system that pumps significantly more water than is necessary to prevent off-site contaminant migration.

Page 7, Paragraph 3---*On-site recovery wells do not have any effect on the deep sand gravel layer that overlies the bedrock. The flow system in this interval is governed by the OWS wells, which pull the groundwater to the north.*

The attached Figures 1, 2 and 3 from the final CMS show that the EKCO recovery wells (W-1 and W-10) do have an impact on the deep unit east of the facility. These figures show that the EKCO recovery wells induce a significant gradient from the deep unit east of the facility back toward the site. These figures clearly show that the EKCO recovery wells prevent any off-site migration and also pull groundwater from the deep unit toward the site.

Incorporation of these CMS figures and findings into the SB would provide a more accurate and complete representation of the conditions at and around the EKCO Housewares facility.

Thank you for your consideration of these matters. Please contact me at (201) 660-5590 if you have any questions.

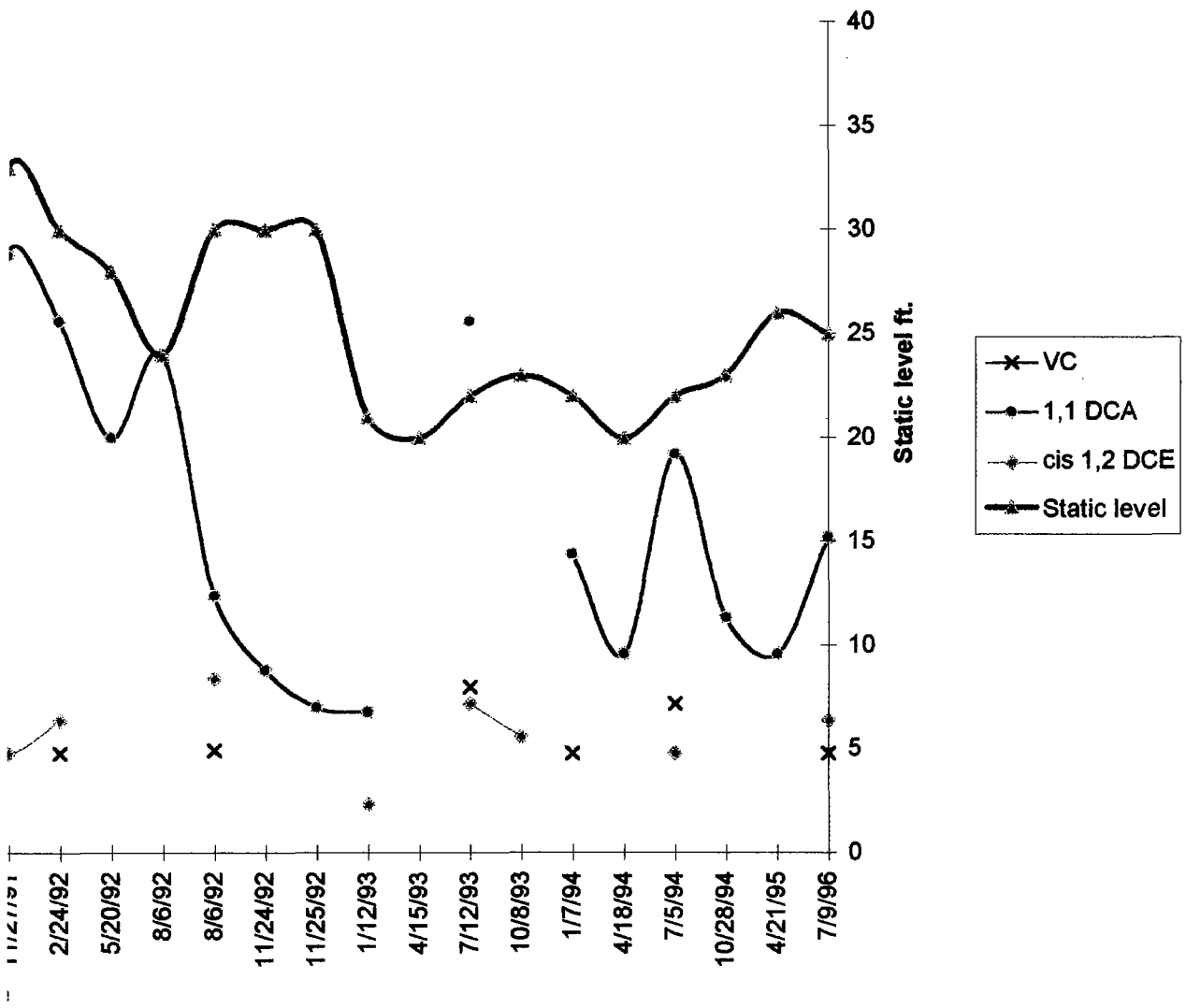
Sincerely,

Patricia W. McDonald

Patricia W. McDonald
Manager
Environmental Affairs

cc: G. Moss, AHPC
L. Bove, Weston

PWM:cc
I:\mcdonald\ekcohsw.ltr
Attachments



jure 1 VOC Concentrations
well OWS 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

RCRA RECORD OF DECISION
SELECTION OF REMEDIAL ALTERNATIVE

FOR

EKCO HOUSEWARES, INCORPORATED
MASSILLON, OHIO
OHD 045 205 424

CONSUMERS
OHIO
WATER • COMPANY

September 21, 1996

Ms. Cheryl Allen
Community Involvement Coordinator
U.S. Environmental Protection Agency
Region 5 (P-19J)
77 West Jackson Blvd.
Chicago, Il 60604

Re: Proposed Statement of Basis
Ekco Housewares, Incorporated
Massillon, Ohio
OHD 045 205 424

Dear Ms. Allen:

Enclosed are the comments, with references, of Consumers Ohio Water Company (COWC) to the Proposed Statement of Basis for Ekco Housewares, Incorporated, Massillon, Ohio.

COWC appreciates the time and effort you and Mr. Smith put forth in visiting Massillon and conducting the public information meeting. COWC also appreciates having the opportunity to comment on the proposed cleanup for contamination at Ekco Housewares, Inc.

Please be informed that COWC is the same company that is referenced in documents prior to 1995 as Ohio Water Service (OWS).

Sincerely,

Michael F. Burns

Stark Regional Division
23 Third Street, S.E.
Post Office Box 584
Massillon, Ohio 44648
Tel (330)833-4156
Fax (330)833-2469

Comments of Consumers Ohio Water Company

to

Proposed Statement of Basis

for

Ekco Housewares, Incorporated, Massillon, Ohio

The Proposed Statement of Basis (SB) for Ekco Housewares, Incorporated, Massillon, Ohio contains the following, " As a result of the pumping, the groundwater in the shallow (Figure 1-8), intermediate (Figure 1-9), and bedrock (Figure 1-10) water-bearing zones under the entire site is flowing directly toward production wells W-1 and W-10, and does not appear to flow off-site. Groundwater in the deep sand and gravel water bearing unit flows directly north toward the pumping OWS production wells OWS 1, 2, and 3 (Figure 1-7)."

COWC does not believe this is an accurate portrayal of ground water flow in the area under pumping and non-pumping conditions. COWC believes that natural ground water flow subparallels the flow of the Tuscarawas River under non-pumping conditions (Figure: Model Grid and Static Piezometric Map). COWC also believes pumping conditions are different and ground water flows directly into OWS 1, 2, and 3 from the surrounding area (Figure: 1 and 5 Year Wellhead Protection Areas).

The Corrective Measures Study (CMS) Ekco Housewares, Inc., Massillon, Ohio November 1993, contains the following, "Shallow groundwater sampling results indicate that there is a separate and relatively new TCE source approximately 500 ft north of the Ekco site at Well S-12. The exceptionally high level of TCE and the absence of any appreciable breakdown products indicate that it is a fairly recent TCE release, and it is unrelated to activities that have occurred at the Ekco site. However, the leading edge of the plume originating from Ekco within the bedrock aquifer is located under this point in well R-12."

COWC agrees that contamination is flowing from the Ekco site and contamination at R-12 is attributed to the Ekco spill. COWC can not positively identify the location of the leading edge of the contamination plume. COWC has analyzed wells OWS 1, 2, and 3 on a routine basis since October, 1987 and has detected the following: vinyl chloride (VC), 1,1, dichloroethane (1,1 DCA) and cis 1,2 dichloroethylene (cis 1,2 DCE) (Figure 1).

COWC agrees with the statement that high levels of TCE in S-12 are a separate and unrelated event. Aerial photographs from 1965, on file with the Stark County Engineers, show the presence of an unidentified structure(s) in the general location of wells S-12 and R-12. The purpose of the structure(s) is not known to COWC and the structure(s) may no longer exist. COWC believes that the purpose of the structure(s) and the activity conducted at the site needs to be investigated.

COWC further believes that the absence of breakdown products may be not entirely dependent upon time but may reflect a geochemical environment that is aerobic. Halogenated aliphatic compounds tend to persist in aerobic environments (Domenico and Schwartz). COWC believes that there are two separate events taking place at R-12, S-12 and that both events are potentially harmful to OWS 1, 2, and 3.

Since the presence of contamination is an established event and the migration of the contamination towards wells OWS 1, 2, and 3 has the potential of affecting our source of drinking water, COWC requests the following:

Dedicated pumps be installed at ten wells; R-12, S-12, I-13, I-11, I-4, R-4, I-9, I-8, I-8D, and OWS-4.

VOC monitoring be conducted at these wells on a quarterly basis and analyzed in an approved lab with COWC's approval.

All analyses be made available to COWC.

Test for Cd, Cr, and Pb in Newman Creek and the above wells. Suspend metal testing if elevated metal levels are not detected. Continue metal testing if elevated levels are detected in any of the wells.

These requests reflect what COWC believes is needed at a minimum to help protect the ground water resources that are the source of drinking water for the 75,000 customers of COWC.

References

Domenico, P. A., and Schwartz, F. W., 1990 *Physical and Chemical Hydrogeology,* Wiley, New York.

Weston, R. F., Inc., 1993 *Corrective Measures Study Ekco Housewares, Inc., Massillon, Ohio* West Chester, Pennsylvania.

D.3.1
OHD 045 205 424

Roy F. Weston, Inc.
1 Weston Way
West Chester, Pennsylvania 19380-1499
610-701-3000 • Fax 610-701-3186

Ms. Sally Ann Averill
Project Manager
U.S. Environmental Protection Agency
Office of RCRA Region 5
HRE-8J
77 West Jackson Blvd.
Chicago, IL 60604-3590

W.O. No. 02994-002-005

Subject: EKCO Housewares, Massillon, Ohio, Facility Corrective Measures Study

Dear Ms. Averill:

This letter is in response to your most recent questions concerning Appendix B of the Corrective Measures Study (CMS) Report. This appendix presents the calculations used to determine the soil cleanup goals for the EKCO facility. A previous letter sent to you dated 13 July presented corrected soil cleanup goals. A sample calculation used for determining the trichloroethene (TCE) soil cleanup goal is shown below.

Where:

C_s = Soil cleanup goal µg/kg
C_1 = Leachate concentrations
C_2 = Upgradient concentrations
C_3 = Target groundwater concentrations (MCL), 5 µg/L for TCE
V_1 = Infiltration rate
V_2 = Aquifer flow rate
R = Recharge = 10 inches/year = 0.00228 ft/day
K = Hydraulic conductivity = 1.0 ft/day
i = Groundwater gradient = 0.071 (unitless)
h = Aquifer saturated thickness = 30 ft
T = Width of groundwater flow under contaminated zone = cancels out of equation (ft)
L = Length of groundwater flow under contaminated zone = 100 ft
foc = Fraction of organic carbon = 0.02 (source: *Geochemistry*, page 268 [Brownlow, 1979])
Koc = Organic carbon water partition coefficient = 120 L/kg (source: *Contaminant Hydrogeology*, page 137 [Fetter, 1993])

Equation 1

$$V_1 = (R)\ (L)\ (T)$$
$$= (0.00228\ ft/day)\ (100\ ft)\ (T)$$
$$= (0.228\ ft^2/day)\ T$$

Equation 2

$$V_2 = (K)\ (i)\ (h)\ (T)$$
$$= (1.0\ ft/day)\ (0.071)\ (30\ ft)\ (T)$$
$$= (2.13\ ft^2/day)\ T$$

Equation 3

$$C_1 = C_3\ \frac{(V_1 + V_2)}{V_1}$$
$$= \frac{(5.0\ \mu g/L)\ (0.228\ ft^2/day\ T + 2.13\ ft^2/day\ T)}{0.228\ ft^2/day\ T)}$$
$$= 51.71\ \mu g/L$$

Equation 4

$$C_s = (foc)\ (Koc)\ (C_1)$$
$$= (0.02)\ (120 L/kg)\ (51.71\ \mu g/L)$$
$$\mathbf{C_s = 124\ \mu g/kg}$$

A complete explanation is provided in the CMS Report, Appendix B. If you have any questions, please call me at (610) 701-3020.

Very truly yours,

ROY F. WESTON, INC.

Thomas S. Cornuet

for Lawrence J. Bove, P.E.
Principal Project Manager

cc: P. McDonald — AHP
J. Burman — EKCO
T. Cornuet — WESTON

EKCO\AVERILL2.LTR

Roy F. Weston, Inc.
1 Weston Way
West Chester, Pennsylvania 19380-1499
® 610-701-3000 • Fax 610-701-3186

13 July 1995

Ms. Sally Ann Averill
Project Manager
U.S. Environmental Protection Agency
Office of RCRA Region 5
HRE-8J
77 West Jackson Blvd.
Chicago, IL 60604-3590

W.O. No. 02994-002-005

Subject: EKCO Housewares, Inc., Massillon, Ohio Facility Corrective Measures Study

Dear Ms. Averill:

This letter is in response to your two questions concerning Appendix B of the Corrective Measures Studies (CMS) Report. This appendix presents the calculations used to determine the soil cleanup goals for the EKCO facility. Your first question pertained to the source for three of the input parameters used for the calculations - effective porosity, groundwater gradient, and fraction of organic carbon (foc). The effective porosity value of 15% was derived from the RCRA Feasibility Investigation (RFI) Report page 4-57. The groundwater gradient value of 7% was also derived from the RFI Report page 4-57. No site data are currently available for estimating foc, therefore, the value of 2% was estimated based on literature estimates for fine-grained material.

Your second question pertained to the reproducibility of the soil cleanup levels presented in the table. Review of Appendix B in the CMS indicated that the equations presented on page B-1 were correct but the first equation at the top of page B-2 is presented incorrectly. The effective porosity value (n_e) shown in the denominator should be removed and the equation should read $V_2 = K * i * h * T$. The incorrect form of the equation was used to calculate the soil cleanup goals presented on the table on page B-3. Using the corrected equation results in lower proposed soil cleanup goals for the seven contaminants shown on the table. The corrected soil cleanup goals for these seven contaminants are presented below.

Contaminant	Corrected Soil Goal (ug/Kg)
1,1-DCE	94
1,2-DCE	1,219
1,1,1-TCA	6,280
TCE	124
Toluene	61,980
Chloroform	82,430
1,1,2-TCA	58

Although the proposed soil cleanup goals have changed, the approach to soil remediation will remain the same. If you have any questions, or if you would like the CMS Appendix B revised to reflect these corrections, please call me at (610)701-3020.

Very truly yours,

ROY F. WESTON, INC.

Thomas S. Cornuet

Lawrence J. Bove, P.E.
Principal Project Manager

LJB

cc: P. McDonald - AHP
T. Cornuet - WESTON

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: MAY 3 · 1995

SUBJECT: Corrective Action
Remedy Selection Process

FROM: Norm Niedergang [signature]
Associate Director
Office of RCRA

TO: All Technical Staff

David,
I've sent copies to Joe and George as well. Note pages 2 and 3.
[initials] 4/23/96

A review of information on our corrective action accomplishments and goals has indicated that we are approaching remedy selection decisions on a number of corrective action projects. While this is very good news it has raised a number of questions on our internal remedy selection process. To address this issue we have prepared the attached document which summarizes the RCRA remedy selection process in Region 5. This document should be used as a tool by all corrective action project coordinators to assure that our responsibilities to the public are met and to assure a consistent internal approach to remedy selection and documentation. This document is meant to streamline our remedy selection process by answering commonly asked questions concerning aspects of the process and clarify the roles and responsibilities of personnel involved in this process.

If you have any questions or would like more information please contact Kevin Pierard.

Attachment

Remedy Selection Process
Office of RCRA - Corrective Action Program
May 30, 1995

Generally facilities in the corrective action process will complete a CMS report which includes several feasible remedial alternatives for the facility. When the CMS report meets the goals specified in the CMS workplan/scope of work the report should be approved. This "approval" does not constitute a final endorsement of any remedy described in the report. The report simply describes remedies evaluated by the owner/operator and presents the remedy favored by the owner/operator. U.S. EPA approval indicates that the report has met the specifications contained in the CMS workplan. Disagreement with the owner/operator regarding which remedy is preferred is not a reason to disapprove the CMS report. It is recommended that during the CMS report review process that the Project Coordinator begins to prepare the Statement of Basis/Fact Sheet (SB/FS) to assure that the CMS report contains sufficient information to allow development of the SB/FS. For permit decisions a SB/FS should be prepared to supplement the draft permit modification.

At this stage we begin the internal process of remedy selection outlined below. When the CMS stage is abbreviated or eliminated, such as when presumptive remedies are used, this same internal process should continue to be followed. As issues are identified which may involve other program areas the Project Coordinator should consult with the appropriate program office.

A. CMS Report Approval - See above

B. Statement of Basis/Fact Sheet and Draft Permit Modification - Project Coordinator prepares a SB/FS and Draft Permit Modification where applicable. The SB/FS is a public participation document that summarizes the corrective measure options and proposes the remedy which U.S. EPA prefers.

1. Evaluation Criteria - The SB/FS should include a discussion of each corrective measures evaluation criterion contained in the Guidance on Corrective Action Decision Documents (OSWER Directive 9902.6).

2. CAMU - If the SB/FS includes the use of a CAMU the SB/FS should include the criteria for tentatively designating a CAMU and a summary of how these criteria are met. See 40 CFR 264.552(c).

3. Temporary Unit - If a temporary unit (TU) is to be used during the corrective measure implementation a summary of the criteria for tentatively designating the TU should be included in the SB/FS. See 40 CFR 264.553.

4. Review - The SB/FS and Draft Permit Modification should be submitted to the Section Chief and Corrective Action Process Manager for concurrent review, followed by submittal to the Branch Chief for concurrence.

NOTE: The CAMU, TU, and Corrective Measure designation are considered Class III permit modifications while a TU extension of time is considered a Class II modification. See 40 CFR 270.41 and 270.42.

NOTE: The SB/FS is a summary document. Detailed information that is available concerning each Corrective Measures Criterion, CAMU Criteria, and TU must be available in the Administrative Record, as part of the CMS report. Other technical information used in the decision-making should also be part of the Administrative Record. A complete copy of the Administrative Record should be maintained in the information repository. Detailed technical specifications for selected corrective measures, including CAMUs, are not required in the SB/FS, these should be proposed in the CMI workplan.

C. Public Notice - Public notification of a permit action must be prepared in accordance with 40 CFR 124.10(d). Permit modifications at the request of the Permittee require that the Permittee notify EPA and the public in accordance with 40 CFR 270.42 and 40 CFR 124.10(c). The Public notice of the SB/FS under Corrective Action Orders should generally discuss the specific items in 40 CFR 124.10(d). Additional guidance on public involvement is available in the RCRA Public Involvement Manual (EPA530-R-93-006).

1. Comment Period - The comment period for U.S. EPA initiated permit modifications, and Permittee initiated modifications is open for at least 45 and 60 days respectively. See 40 CFR 124.10(b) and 40 CFR 270.42. The recommended comment period for orders is 45 days.

2. Information - At a minimum the SB/FS, RFI/CMS Reports, draft Permit Modification and the remainder of the Administrative Record, are made available for public review.

3. Comments Requested - The notice should emphasize that U.S. EPA is soliciting comments on the RFI/CMS Reports, all corrective measure alternatives, as well as the remedy proposed by U.S. EPA. A clear statement should be made that the proposed remedy is only a preliminary determination. U.S. EPA's ultimately selected remedy may be different based on comments received during the comment period.

4. Public Hearing/Meeting - The permittee is required to hold a public meeting for all class 2 and 3 permit modifications. Public meetings are not required for class 1 modifications. See 40 CFR 270.42(b)(4) and (c)(4). Public hearings on U.S. EPA initiated permit modifications are required if requested or when there is significant public interest in the facility. Similarly public hearings are recommended in conjunction with corrective action order remedy proposals under these circumstances.

D. Final Decision and Response to Comments (FD/RTC) - This document is prepared by the Project Coordinator and identifies the selected remedy, points out the changes made to the proposed remedy due to comments, explains rationale for the selected remedy, and provides a comprehensive response to comments regarding the proposed remedy and alternatives. See OSWER Directive 9902.6, RCRA Public Involvement Manual EPA530-R-93-006, and 40 CFR 124.17.

1. Provide a copy of the Draft Final Decision to OSW for consultation if desired by the Region.

2. Provide the FD/RTC to Section Chief and Corrective Action Process Manager for concurrent review.

3. Provide the FD/RTC to Branch Chief and Associate Division Director for concurrence.

4. Brief the RAs office and WMD Director on the selected remedy and our response to comments. (The WMD Director signs the FD/RTC for Orders and the Associate Division Director signs them for permits).

5. Provide the FD/RTC to the facility and public. The CAPM will provide a copy of the FD/RTC to Headquarters. Issue the final Permit/Permit Modification, Order/Order Amendment.

OHD 045 205 424

Roy F. Weston, Inc.
1 Weston Way
West Chester, Pennsylvania 19380-1499
® 610-701-3000 • Fax 610-701-3186

1 July 1994

Ms. Sally Ann Averill
Project Manager
Office of RCRA (HRE-8J)
U.S. EPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590

W.O. 02994-002-005

RE: CMS Addendum
EKCO Housewares, Inc., Massillon, Ohio

Dear Ms. Averill:

On behalf of American Home Products Corporation, Roy F. Weston, Inc. (WESTON) is submitting three (3) copies of the *Draft Addendum to the CMS Report* for the EKCO Housewares, Inc. facility in Massillon, Ohio. This report presents the findings of WESTON's analysis of the following alternatives for groundwater remediation:

- GW-4: Pulse pumping of wells W-1 and W-10 only.
- GW-5: Use of overburden recovery wells and pulse pumping of wells W-1 and W-10.
- GW-6: Air sparging within shallow zone and pulse pumping of W-1 and W-10.

WESTON also reexamined the capital cost and the operating and maintenance cost estimates for alternatives GW-2 and GW-3. The updated costs are summarized in Table 6-2.

If there are additional questions, please contact Patricia McDonald at (201) 660-5590 or me at (610) 701-3020.

Very truly yours,

ROY F. WESTON, INC.

Lawrence J. Bove

Lawrence J. Bove, P.E.
Principal Project Manager

Attachments

cc: P. McDonald - AHPC

1063.mtl

D.3.1

FEB 0 8 1994

Ms. Patricia McDonald
American Home Products
5 Giralda Farms
Madison, New Jersey 07940

HRE-8J

RE: Approval with Conditions of Revised Corrective Measures Study Report, Ekco Housewares, Inc., OHD 045 205 424

Dear Ms. McDonald:

The United States Environmental Protection Agency (U.S. EPA) has reviewed your revised Final Corrective Measures Study (CMS) Report submitted on November 24, 1993. The final CMS report was required to address deficiencies of the draft report as described in U.S. EPA correspondence dated October 21, 1993.

U.S. EPA has determined that the deficiencies have been adequately addressed in the comments and response summary and Final CMS report. U.S. EPA hereby approves the CMS report.

The public review and comment period will be initiated upon U.S. EPA public notice of the proposed remedy selection in local newspapers. U.S. EPA will make all final reports, plans and pertinent documents along with our Statement of Basis (proposed remedy) available to the public for review and comment for sixty (60) days. Ekco Housewares will be notified of the proposed selection.

If you should have any questions concerning this approval, please contact Sally Averill at (312) 886-4439.

Sincerely yours,

Joseph M. Boyle, Chief
RCRA Enforcement Branch

HRE-8J\Averill\sa-ab\6-4439\D.\EKCMS.RPT\February 3, 1994

OFFICIAL FILE COPY

CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRTRY	AB 1 Feb 94	AB 4 Feb 94	2/7/94
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	SA 2/3/94	2-4-94	2/7/94

D.3.1

NOV 30 1993

MAR 07 1994 HRE-8J

RECEIVED
WMD RCRA
RECORD CENTER

Ms. Patricia W. McDonald
American Home Products Corporation
5 Giralda Farms
Madison, New Jersey 07940

RE: Revised RCRA Corrective Measures Study (CMS) Report
Ekco Housewares, Inc.
OHD 045 205 424

Dear Ms. McDonald:

The United States Environmental Protection Agency (U.S. EPA) has received your request for an extension for submitting a revised CMS Report for the Ekco Housewares facility in Massillon, Ohio. The request for an extension is approved due to the recent move by your company resulting in a delay in receiving notice of the disapproval of the report.

The revised CMS Report will be due Friday, November 26, 1993. If you should have any questions concerning this extension, please contact Sally Averill at (312) 886-4439.

Sincerely yours,

ORIGINAL SIGNED BY
JOSEPH M. BOYLE

Joseph M. Boyle, Chief
RCRA Enforcement Branch

HRE-8J:SAVERILL:sa:6-4439:f:\user\share\mnoh.tes\ekco.ext

OFFICIAL FILE COPY

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
11/22/93	11/16/93	11/17/93	11/29/93

Received 11/29/93 SM D.3.1

Roy F. Weston, Inc.
1 Weston Way
West Chester, Pennsylvania 19380-1499
215-692-3030 • Fax 215-430-3186

24 November 1993

Ms. Sally Ann Averill
Project Manager
Office of RCRA (HRE-8J)
U.S. EPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590

W.O. #02994-002-005

RE: Corrected Pages with Response to Comments
CMS Final Report
EKCO Housewares, Massillon, OH

Dear Ms. Averill:

At the direction of American Home Products, Inc. (AHP), Roy F. Weston, Inc. (WESTON) is submitting three copies of the corrected pages (includes revised Sections 1, 2, 4, 5, and 6) which incorporates EPA comments on the EKCO Housewares CMS Report. The corrected pages should be used as replacement pages to the original submission of CMS and the resulting document will serve as the CMS Final Report.

Although all EPA comments have been addressed in these revised pages, EKCO disagrees with many of the changes required by EPA. EKCO has provided its response to each of EPA's comments in Appendix A of the CMS. These responses summarize the bases for EKCO's disagreement with certain aspects of these comments.

If you have any questions on this information, please feel free to call me at (215) 430-3020.

Very truly yours,

ROY F. WESTON, INC.

Lawrence J. Bove

Lawrence J. Bove, P.E.
Project Manager

LJB:kmp
bove/112493-2.ltr

cc: P. McDonald (AHP)
File 19.0

D.3.1

AMERICAN HOME PRODUCTS CORPORATION
FIVE GIRALDA FARMS, MADISON, NEW JERSEY 07940, (201) 660-5000

ENVIRONMENT & SAFETY

November 1, 1993

Sally Ann Averill
Project Manager
Office of RCRA
US Environmental Protection Agency
HRE-8J
77 West Jackson Blvd.
Chicago, Il 60604-3590

Re: **Notification of Disapproval - Draft CMS Report**
EKCO Housewares, Inc.
OHD 045 205 424

Dear Ms. Averill:

As we discussed today, due to American Home Products' recent move to Madison, New Jersey, I did not receive the referenced document until October 28, 1993.

I am currently reviewing the U.S. EPA's comments with Weston and, because of the technical issues raised in your letter, I request an additional fourteen (14) days to respond. The response would then be due Friday, November 26, 1993.

Thank you for your cooperation in this matter.

Sincerely,

Patricia W. McDonald

Patricia W. McDonald
Manager
Environmental Affairs

OCT 21 1993

D.3.1

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Pat McDonald
American Home Products
685 Third Avenue, 8th Floor
New York, NY 10017

HRE-8J

Re: Notification of Disapproval of the draft Corrective Measures Study (CMS) Report for EKCO Housewares, Inc.
OHD 045 205 424

Dear Ms. McDonald:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the draft Corrective Measures Study (CMS) report submitted on September 30, 1993, for the EKCO Housewares facility in Massillon, Ohio. This report is hereby disapproved. The deficiencies and comments on the report are enclosed.

In accordance with Section VI.L. of the Administrative Order on Consent, Docket No. V-W-91-R-01 (Consent Order), please make the required changes to the report and submit the revised document within fourteen (14) days of receipt of this letter. If you should have any questions, please contact Sally Averill at (312) 886-4439.

Sincerely yours,

ORIGINAL SIGNED BY
JOSEPH M. BOYLE

Joseph M. Boyle, Chief
RCRA Enforcement Branch

Enclosure
HRE-8J:SAVERILL:jp/ab:10/15/93:f:\user\share\mnoh.tes\cms-dis.eko

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
AB 19Oct93		10/14/93	10/20/93

ap 10/20/93

Jon Peterson's Comments.

U.S. EPA COMMENTS ON DRAFT CMS REPORT
Dated September 1993
EKCO Housewares, Inc. -- Massillon, Ohio
OHD 045 205 424

Section 1.3.2 - Page 1-24 - Hydrogeologic Summary

The first full sentence on this page states that shale and argillaceous sandstone act as barriers to groundwater flow and that variations in permeability occur locally. The following should be added to this sentence: "...and they are not laterally continuous across the site."

Second paragraph in same section

After the first sentence, include the following sentence: "On-site recovery wells do not have any effect on the deep sand and gravel layer which overlies the bedrock. The flow system in this interval is governed by the OWS wells which pull the groundwater to the north."

Section 1.3.3.2 - Groundwater Geochemical Summary

The last statement in the 2nd paragraph is not accurate and it should be replaced by the following: "Groundwater in the deep sand and gravel layer overlying the bedrock is moving away from the site towards the OWS 1, 2, and 3, wells. VOCs that were released into this layer in the past have caused OWS4 to be shut down and they are moving towards OWS 1, 2, and 3, which have not yet become contaminated.

Third paragraph, same section

Add the following sentence at the end of this paragraph: "However, the leading edge of the plume originating from ECKO within the bedrock aquifer is located under this same point in well R-12.

Section 1.4.1, page 1-29, ECKO Recovery Wells

After the first sentence in the fourth paragraph, add the following: "However, the deep aquifer begins at the eastern edge of the ECKO property and is the principal aquifer utilized by the Ohio Water Service.

After the first sentence in the last paragraph in this section, add the following: "VOC contamination migrated into the deep aquifer in the past and this contamination is currently migrating towards the OWS wells to the north.

Section 2.4.1 - Bulleted objectives

Add this objective: Achieve regulatory standards (MCLs) for

organics found in deep sand and gravel layer which serves the OWS wells in area which are not located on the site, but are adjacent to it and have been impacted by it.

Section 2.4.2 - Soils

Delete the references to the proposed RCRA corrective action levels as these are not expected to be finalized and furthermore, the soil cleanup level required to protect groundwater will always be lower than those required for direct contact risks.

Delete the second to last sentence in this paragraph which designates a compliance point for MCLs. This doesn't belong in the section on **soils** and it is not necessarily the Agency's view, therefore, it should be deleted.

Section 2.4.2.1 - Organics

Again, delete the references to proposed RCRA corrective action levels.

Page 4-3

For the short descriptions of each of the last two groundwater alternatives, insert the number of additional extraction wells to be implemented in each.

Also, specify what the treatment will be for the extracted groundwater in this section.

Section 5.3 - Detailed Analysis of Groundwater Alternatives

For both of the groundwater alternatives, GW2 and GW3, much more detail on the proposed configuration of these alternatives is given in this section than in the section on the description of alternatives in Chapter 4. This approach is acceptable in this particular case, because Chapter 5 does launch right into the detailed descriptions of the alternatives. However, to make this transition clear to the reader, appropriate references to these detailed descriptions should be placed back in Chapter 4.

Proposed extraction wells in alternatives GW2 and GW3 (Shown in Figures 5-1 and 5-2)

It is not clear that the VOC plume that extends from R-2, through R-10, and through R-12 will be captured by placement of an extraction well at I-2, nor that the groundwater which has escaped the site and caused the shutdown of OWS-4, will be captured by either of these two proposed configurations. Although, alternative GW3 did come closer to this than alternative GW2, some flexibility should be considered in proposing extraction well locations to provide for the other remedial objective which is to restore the groundwater in the deep sand and gravel layer that services the Ohio Water Service

and allow for OWS-4 to be used again in the future.

Also under both alternatives GW2 and GW3, the air stripper is in need of new packing material and the discharge lines from the air stripper to the discharge are leaking and allowing contaminated groundwater to mix with the treated water before discharge. This issue should be addressed in coming up with a final groundwater alternative.

Also, the maintenance program for the air stripper only states that it would be refilled once every 5 years. A more frequent program of maintaining the air stripping tower is recommended due to the high iron content of the groundwater in this area. This would affect the annual Operation and Maintenance (O&M) costs.

Extraction Well Shut-down Criteria

Delete the bottom paragraph on page 5-6 and the rest of this paragraph on page 5-9. Do the same for the bottom paragraph on page 5-14. Both of these paragraphs attempt to stipulate the criteria under which the extraction wells would be shut down and the length of time that monitoring would take place. However, these sections do not cover this issue completely (i.e. frequency), and they deserve more thought than has been given to them here. It is not desirable to include these items in the feasibility study unless a very complete program had been outlined, but it has not. Consequently, this issue will have to be taken up with the Agency as a separate matter once implementation of the groundwater extraction alternatives has begun. What could have been included here in the report would be the estimated cleanup time under each of the alternatives.

not addressed

Section 5.3.2.3 - Page 5-10 - Human Health Evaluation

did not address

The second sentence in this paragraph is not accurate. Alternative GW2 will not prevent the VOCs which are in the deep sand and gravel layer, which have caused the shut down of OWS-4 already, from migrating towards OWS 1, 2, and 3.

Section 6.2 - Recommended Alternatives

Change the last 5 words of the first sentence to: could both meet the objectives, depending upon extraction well placement.

Section 6.1.2 - Soils underneath the buildings

Under IS-2, it states that this alternative is strictly a vertical Soil Vapor Extraction, whereas, on page 4-4, the description of this alternative was such that it could include both vertical and horizontal wells. Please make these two sections consistent. It is recommended that you leave yourselves the flexibility to use whichever types of soil vapor extraction wells would work better, possibly even a combination of both vertical wells and horizontal trenches.

D.3.1

AMERICAN HOME PRODUCTS CORPORATION

685 THIRD AVENUE
NEW YORK, N.Y. 10017
(212) 878-5000

August 18, 1993

Jon Peterson
Project Coordinator (HRE-8J)
RCRA Enforcement Branch
US Environmental Protection Agency
77 West Jackson Blvd.
Chicago, IL 60604-3590

Re: CMS Submission Date
EKCO Housewares, Massillon, Ohio

Dear Mr. Peterson:

This is to confirm our conversation yesterday in which American Home Products agreed to submit the Corrective Measures Study for the EKCO Housewares-Massilon, Ohio facility by September 30, 1993.

Please contact me if you have any questions.

Sincerely,

Patricia W. McDonald

Patricia W. McDonald
Manager
Environmental Affairs

cc: G. Moss, AHP
V. Velez, Weston

WESTON
MANAGERS DESIGNERS/CONSULTANTS

WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

RECEIVED

2 April 1991

Ms. Sally Averill
Project Manager
U.S. EPA - Region 5
230 S. Dearborn St.
Chicago, IL 60604

W.O. #2994-02-03

RE: RFI/CMS Work Plan
EKCO Housewares, Massillon, OH

Dear Ms. Averill:

Enclosed please find an additional copy of the EKCO RFI/CMS Work Plan as you requested from Bob Zollner during his recent visit to the U.S. EPA Regional office. If I can be of further assistance, please contact me at (215) 344-3643.

Very truly yours,

ROY F. WESTON, INC.

Harold G Byer Jr

H. G. Byer, Jr.
Project Manager

HGB/lam

cc: S. Schuyler
R. Zollner
M. Leek
T. Cornuet

4/3/91

WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

28 March 1991

Ms. Sally Averill
Project Manager
U.S. EPA - Region 5
230 S. Dearborn St.
Chicago, IL 60604

W.O. #2994-02-03

RE: RFI/CMS Packer Testing, EKCO Housewares
Massillon, OH

Dear Ms. Averill:

Enclosed, please find a copy of the packer test procedure WESTON technical personnel will follow during the test at EKCO. We are tentatively planning to mobilize to the EKCO facility on 15 April. The geophysical logging should start on 16 April with the actual packer testing starting the following day, 17 April. Barring technical or weather complications, the packer testing should take no longer than two weeks.

Please contact me at (215) 344-3643 if you have any questions or concerns. If an introductory meeting is necessary I would like to tentatively schedule it for Monday afternoon, 15 April. We can discuss the exact time at a later date.

Very truly yours,

ROY F. WESTON, INC.

Harold G. Byer, Jr.
Project Manager

HGB/lam

cc: M. N. Bhatla
M. Eggert - OEPA
T. Shingleton - EKCO
R. Zollner - AHP
T. Cornuet
S. Schuyler
P. Landry

PACKER TEST

EKCO HOUSEWARES

In order to evaluate the vertical extent of VOC contamination of groundwater in the bedrock beneath the site, straddle packer tests will be performed on monitor wells R-1 and R-2. Inflatable straddle packers will be utilized to isolate and test zones of interest within the open borehole sections of the well bores. Discrete sampling and pumping will be performed to provide water quality and hydrologic data within the straddled zones.

Prior to performing the packer tests, borehole geophysical logging will be performed on monitor wells R-1, R-2, and R-4 to obtain information necessary for selection of packer intervals. Caliper and gamma, logs will be run and appropriate smooth flow meter borehole sections (ideally), situated adjacent to shale beds, will be identified for seating packers to provide seals. Constraints upon the number of tests and upon packer spacing will be the condition of the borehole and the distribution and thickness of shale beds.

Purpose

The purpose of the work is to evaluate the following:

- Vertical profile of groundwater quality and head distributions within the borehole between water bearing units.
- Extent of vertical connection between the alternating sandstone and shale beds
- Extent of horizontal connection between the two tested wells (R-1 and R-2) and the other surrounding bedrock wells (R-4 and R-5)
- Specific capacities and hydraulic conductivities of the primary water bearing units within each well.
- Correlation of the shale and sandstone beds in R-1, R-2 and R-4 in order to better understand the geology and potential for contaminant migration at the site
- Identification of fractures and major water producing zones in the wells

Protocol

The specific protocol for the straddle packer tests is as follows:

1. Decontaminate the packers and all downhole equipment following procedures presented in the QAPP (QAPP Subsection 6.2.1.1).

2. Conduct geophysical logging of the well with caliper, and natural gamma-ray logs.

3. Prior to testing each zone, obtain static water levels and calibrate the pressure transducers to these static levels (T.O.C.).

4. Lower the packer tool configuration to the deepest test zone and calibrate all transducers to the static water level (referenced to top of casing) prior to inflation of the packer(s).

5. Inflate the packer(s) and allow each isolated portion of the borehole to stabilize. Double-check each pressure transducer and record the head values above, between, and below the packers.

6. Begin pumping of the test zone. Maintain a constant pump rate that will adequately stress the test zone (without dewatering the zone), and record changes in head in the test zone and in the isolated borehole above and below the packers. The objective is to obtain a stable drawdown (+- 0.5 ft) that can be maintained over a 30-minute period with constant rate pumping. Specific capacity values will be estimated by dividing pumping rates by the indicated drawdowns (gpm/ft).

7. Obtain analytical samples once a stable drawdown has been obtained and general water quality parameters have stabilized, and again just prior to termination of pumping. At least five test interval volumes should be pumped between each sample collection.

8. Stop the pumping phase of the test and close the flow control valve to prevent water in the purge line from reversing back down the hole. Monitor the recovery of head values until at least 90 percent recovery is obtained.

9. End the test and deflate the packers. The holes will be tested from the bottom to top.

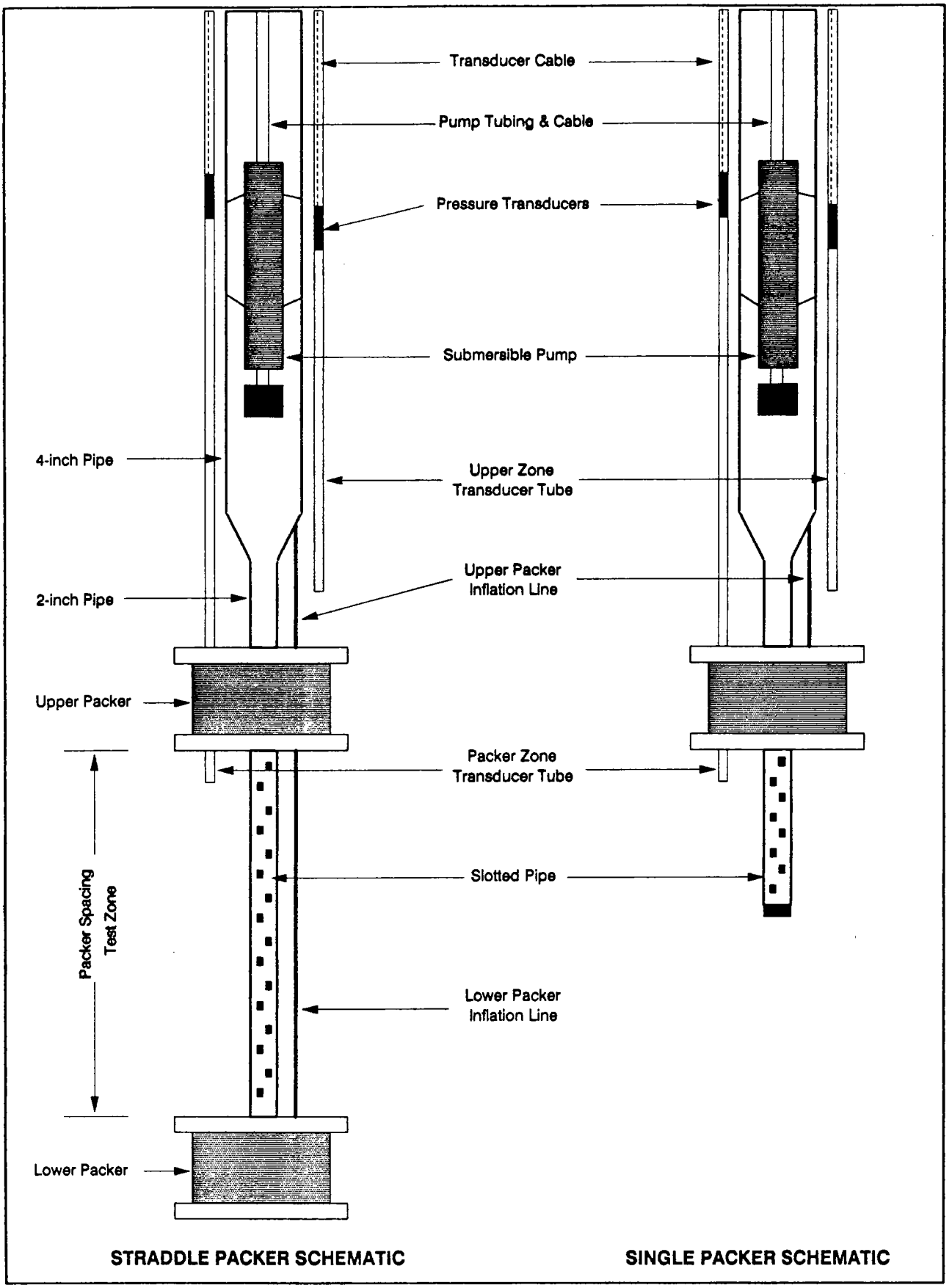
Packer Zones

Based on available geological logs there will be approximately three zones tested in both wells (R-1 and R-2). The proposed packer intervals are listed in the table below.

MONITORING WELL

R-1		R-2	
ZONE	TEST INTERVAL (feet BGS)	ZONE	TEST INTERVAL (feet BGS)
1	107 - 165	1	111 - 169
2	83 - 103	2	87 - 109
3	44 - 79	3	44 - 84

Examination of the geophysical logs from the three wells which will be logged (R-1, R-2, and R-4) may alter the proposed intervals to be tested. Copies of the geological logs are enclosed.



STRADDLE PACKER SCHEMATIC **SINGLE PACKER SCHEMATIC**

THE OHIO DRILLING CO.

INCORPORATED

MASSILLON, OHIO

R-1

DRILLED FOR Ekco Housewares - Massillon, Ohio HOLE NO. 1 - 6" Rotary Hole

DRILLED BY Paul Ortz (McKay & Gould) DRILLER COMPLETED Oct. 25, 19 84

LOCATION See location plat

THICKNESS OF STRATA	STRATA	TOTAL DEPTH	REAMED	WATER FROM SURFACE
41 ft.	Wash	41 ft.		
3 ft.	Sandy Shale	44 ft.		
22 ft.	Sandstone (white, hard & dry)	66 ft.		
2 ft.	Shale	68 ft.		
11 ft.	Sandstone	79 ft.		
4 ft.	Shale	83 ft.		
[illegible] ft.	White Sandstone	91 ft.		
[illegible] ft.	White Sandstone with Black Streaks	103 ft.		
4 ft.	Shale	107 ft.		
15 ft.	Yellow Sandstone	122 ft.		
17 ft.	Yellow & Brown Sandstone	139 ft.		
8 ft.	White Sandstone	147 ft.		
2 ft.	Shale	149 ft.		
16 ft.	White Sandstone	165 ft.		
10 ft.	Shale - Sandy Streaks	175 ft.		

Cased to 42 ft. with 6" pipe.

Test hole pumped at the following depths.

Depth	Static Water Level	Specific Capacity
60 - 80 ft.	38.0 ft.	0.34 gpm per foot of drawdown
80 - 100 ft.	38.0 ft.	0.38 gpm per foot of drawdown
100 - 120 ft.	42.0 ft.	0.65 gpm per foot of drawdown
120 - 140 ft.	39.7 ft.	5.0 gpm per foot of drawdown
140 - 160 ft.	32.5 ft.	less than 0.04 gpm per foot of drawdown
160 - 170 ft.	37.5 ft.	less than 0.04 gpm per foot of drawdown

THE OHIO DRILLING CO.
INCORPORATED
MASSILLON, OHIO

R-2

DRILLED FOR Ekco Housewares - Massillon, Ohio HOLE NO. 2 - 6" Rotary Hole

DRILLED BY Paul Ortz (McKay & Gould) DRILLER COMPLETED Oct. 29, 19 84

LOCATION See location plat

THICKNESS OF STRATA	STRATA	TOTAL DEPTH	REAMED	WATER FROM SURFACE
44 ft.	Top	44 ft.		
40 ft.	Sandstone	84 ft.		
3 ft.	Shale	87 ft.		
22 ft.	Sandstone (brown)	109 ft.		
2 ft.	Shale	111 ft.		
6 ft.	Sandstone (brown)	117 ft.		
3 ft.	Sandstone (reddish)	120 ft.		
23 ft.	Sandstone (brown with black streaks)	143 ft.		
26 ft.	Sandstone (white)	169 ft.		
10 ft.	Shale	179 ft.		

Cased to 46 ft. with 6" pipe.

Test hole pumped at the following depths.

Depth	Static Water Level	Specific Capacity
46.5 - 179 ft.	43.0 ft.	0.91 gpm per foot of drawdown
60 - 80 ft.	34.8 ft.	0.91 gpm per foot of drawdown
80 - 100 ft.	36.5 ft.	0.22 gpm per foot of drawdown
100 - 120 ft.	39.5 ft.	0.17 gpm per foot of drawdown
120 - 140 ft.	34.8 ft.	0.11 gpm per foot of drawdown
140 - 150 ft.	39.1 ft.	0.10 gpm per foot of drawdown

Test hole filled to 150 feet during pumping.

THE OHIO DRILLING CO.
INCORPORATED
MASSILLON, OHIO

DRILLED FOR Ekco Housewares - Massillon, Ohio HOLE NO. R-4
6" Rotary Hole

DRILLED BY John King and McKay & Gould DRILLER COMPLETED July 19, 19 85

LOCATION Northeastern corner of property, approximately 250 ft. east of R-2

THICKNESS OF STRATA	STRATA	TOTAL DEPTH	HEAVED	WATER FROM SURFACE
21 ft.	Clay & Shale	21 ft.		
10 ft.	Clay, Sand & Stones	31 ft.		
19 ft.	Clay, Gravel & Sand	50 ft.		
32 ft.	Sand, Gravel & Clay	82 ft.		13' 0"
10 ft.	Clay, Sand & Gravel	92 ft.		
37 ft.	Sandstone	129 ft.		13' 8"
1 ft.	Shale	130 ft.		
17 ft.	Sandstone	147 ft.		13' 8"
2 ft.	Shale	149 ft.		
11 ft.	Sandstone	160 ft.		13' 8"
5 ft.	Shale	165 ft.		

Cased to 92 feet with 6" pipe.

Test hole pumped at the following depths.

Depth	Static Water Level	Specific Capacity
50'	13' 0"	- -
60'	13' 0"	- -
90' - 100'	13' 8"	1.5 gpm per ft. of drawdown
100' - 120'	13' 8"	0.8 gpm per ft. of drawdown
120' - 140'	13' 8"	0.6 gpm per ft. of drawdown
140' - 160'	13' 8"	2.1 gpm per ft. of drawdown

No instruments

WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

MANAGERS DESIGNERS/CONSULTANTS

17 May 1990

Ms. Sally Averill
Project Manager
U.S. EPA Region 5
230 S. Dearborn Street
Chicago, IL 60604

W.O. #2994-02-03

Re: Revised RFI/CMS Work Plan
EKCO Housewares
Massillon, Ohio

Dear Ms. Averill:

WESTON is submitting two (2) copies of the EKCO Housewares Revised RFI/CMS Work Plan at the direction of Mr. Timothy McGuinness of American Home Products. The revised version is in response to the EPA comment letter dated 14 March 1990 and contains the conclusions of the meetings we held in Chicago and at the EKCO site on 7 and 19 April 1990.

Also, please note the Attachment A to this letter. WESTON addressed each of the points contained in your comment letter by indicating which parts of the text were revised according to our discussions.

If there are any questions, please do not hesitate to contact me at (215) 344-3643.

Very truly yours,

ROY F. WESTON, INC.

Harold G. Byer, Jr.
Project Manager

HGB:lm

/Attachments

cc: Mr. T. McGuinness - AHP
Mr. T. Shingleton - EKCO
Mr. M. Eggert - OEPA, Columbus
Ms. G. Moss - AHP
Mr. S. Oster - Willkie, Farr & Gallagher
Mr. C. Kerry - Mintz, Levin, et.al.

ATTACHMENT A

Comment No.	Response
1.	The text has been revised.
2.	The text and the figure have been revised.
3.	The typographical error has been corrected.
4.	During 1984, when the referenced sample was collected, water supply for the plant was derived from well W-1. The text has been clarified.
5.	The text has been revised.
6.	As described in the text, plating operations ceased in 1978. Subsequently, all metals requiring plating were shipped to the facility already plated.
7.	A new figure has been provided.
8,9,10.	The two cross-sections have been revised and replaced pursuant to comments received regarding the Groundwater Quality Assessment Report. The RFI/CMS Work Plan had been submitted prior to receipt of those comments.
11.	Additional information from planned RFI well pair I-10/R-10 and from nearby soil borings will be available. Furthermore, it is anticipated that recalibration of the model, incorporating all new data, will provide better predictive capabilities in the vicinity of the closed lagoon.
12.	The text has been clarified.
13.	The text has been clarified.
14.	The locations shown on the referenced figure, although approximate due to the scale of the map, are correct. The active hazardous waste storage facility was moved pursuant to regulations requiring at least 50 feet of setback from a facility boundary. On the new figure, the box indicating the approximate location of the incinerator was adjusted slightly to be more accurate.

Comment No.	Response
✓15.	A new figure has been provided. Due to the industrial nature of the area, evaluation of groundwater quality on all sides of the OWS wellfield is important. The wells will be constructed with screen elevations within the reported screen intervals of the OWS wells.
✓16.	A map showing proposed approximate locations of RFI soil borings has been included.
17.	No slug tests had been proposed, nor did we cite any literature in this regard. A series of pumping tests will be performed on several "S" and "I" wells. Results of these efforts, along with lithologic and groundwater elevation data from newly constructed RFI wells, and a modified interpretation of hydraulics in the deep layer (Layer 2, bedrock flow zone) will be input in the model recalibration. It is also important to note that initial modeling efforts were performed without the use of ground water elevation data from well I-8; use of well I-8 necessitated a reinterpretation of groundwater flow in the unconsolidated glacial aquifer. This reinterpretation will also be included in additional modeling efforts, and should minimize difficulties with calibration of groundwater elevations in the lagoon area.
18.	As stated, a solute transport model will be developed only if appropriate. If additional data inputs to the model prove solute transport to be unwarranted, such effort will not be undertaken.
19.	The figure has been revised.
20.	No comment number 20 was included.
21.	The Ohio Water Service Wells have been sampled on a monthly basis for a period of 26 months. All results have been below limits of detection for target VOCs with the exception of the one-time detection referenced in your comment (sample from May, 1989). We do not believe a major concern exists.

Comment No.	Response
22.	Pursuant to the agreed RFI Scope of Work, Task III E, EKCO "... shall provide appropriate assistance..." to EPA in their conduct of community relations activities. Typically, the EPA retains a contractor to prepare plans; any public inquiry of public meetings are the purview of the agency.
23.	A land use map has been provided.
24.	Review of company files and interviews with plant managers revealed no enforcement actions.
25.	No groundwater quality data from the piezometers has been collected. Data from proposed RFI wells I-10,11, and 12 will provide the information discussed in your comment.
26.	Dissolved metals are routine analyses in the quarterly monitoring of the "L" wells.
27.	A shallow well will be installed at the I-4/R-4 location.
28.	In order to evaluate the need for additional bedrock wells, straddle packer testing of existing bedrock wells R-1 and R-2 has been included in the plan. A discussion of the packer test procedures is included in Section 4.1 and Appendix C.
29.	As agreed in our meeting of 5 April 1990, the Work Plan has been revised to reflect one-time sampling and analysis of new RFI wells for VOCs and dissolved metals, and, during the RFI, semi-annual sampling and analysis of all monitor wells (not already being routinely sampled under RCRA or NPDES) for VOCs.
30.	The Work Plan has been revised to include quarterly collection of groundwater and surface water elevation data.
31.	The text has been revised to indicate all new monitor wells will be constructed using stainless steel screen and riser pipe.

Comment No.	Response
32.	An outside source of potable water will be used for drilling, rather than using on-site treated water.
33.	A series of aquifer tests to be performed on selected "S" and "I" wells has been included in the Work Plan.
34.	The presence of pebble and cobble gravels in the glacial deposits requires the use of cable tool drilling. Cable tool provides continuous lithologic information.
35.	The map has been provided.
36.	The bedrock monitor well (R-7) has been included in the Work Plan.
37.	A well nest (I-10 and R-10) has been planned for the north site of Newman Creek, opposite well L-5. This location was not included in the first draft of the Work Plan because access to that property was denied by the landowner. It is our understanding that access is currently being pursued by the agencies.
38.	The referenced quarterly sampling is being undertaken. Results of the DNAPL sampling efforts have been presented in the revised GWQAR and RFI/CMS Work Plan.

MAR 14 1990

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas Shingleton
EKCO Housewares, Inc.
P.O. Box 560
Massillon, Ohio 44648-0560

Re: Notification of Disapproval of RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) Workplan
EKCO Housewares
OHD 045 205 424

Dear Mr. Shingleton:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the above-referenced workplan for the EKCO Housewares facility in Massillon, Ohio. This workplan is hereby disapproved. The deficiencies and comments on the workplan are enclosed.

As stated in the Administrative Order on Consent, EKCO Housewares may meet with U.S. EPA to discuss problems with the workplan within thirty (30) days of receipt of this letter. Within thirty (30) days of this meeting or receipt of this letter (whichever is later) you must submit a revised workplan which addresses the enclosed deficiencies/comments. If you should have any questions or wish to request a meeting, please contact Sally Averill at (312) 886-4439.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Branch

Enclosure

AJR 3/13/90

	TYP.	AUTH	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O.R. A.D.D.	WMD DIR
INIT.	SHB	SA			SHB			for WEM		
DATE	3/12	3/12			3/12			3/13/90		

COMMENTS ON EKCO HOUSEWARES RFI/CMS WORKPLAN
JUNE 1989

Section 1

1. Section 1.1, Page 1-1, Paragraph 2, Line 10.

   Newman Creek borders the EKCO property on the north, not the northwest.

2. Section 1.1, Page 1-1, Paragraph 2, Line 12.

   The locations of the railroads are reversed. See map Figure 1-1, Page 1-2. Also, with respect to Figure 1-1, the quarry west of the plant is a sandstone quarry, not a sand and gravel pit.

3. Section 1.2.2, Page 1-4, Paragraph 2, Line 2.

   The "Groundwater Reclamation Program" was started in 1985. According to Table A-2 in Appendix A it was 1986.

4. Section 1.2.2, Page 1-4, Paragraph 2, Line 9.

   What is meant by "incoming production well water?"

5. Section 1.2.2, Page 1-4, Paragraph 2, Line 14.

   The title of the report is wrong; the report is called Groundwater Quality Assessment Report, not "assurance plan."

6. Section 1.2.2, Table 1-1, Page 1-5.

   Did all plating operations "cease in 1978"? Were they restarted sometime between 1978 and 1987 since they were operating in 1987?

Section 2

7. Section 2.1.1, Figure 2-2, Page 2-5.

   Not all of the referenced legend is clearly seen on the map.

8. Section 2.1.1, Figure 2-3, Page 2-6

   Why is the x-section for I-2 different in Figure 2-3 than in figure 2-4? Two different logs are shown on the respective figures.

9. Section 2.1.1, Figure 2-4, Page 2-7.

   The thickness of fill material shown at locations I-2 and I-5 is questionable. On Figure 2-2, Page 2-5, I-2, the fill is 20 feet thick and on I-5 the fill is 8 to 10 feet thick. On the figures, the logs show the same fill thickness.

10. Section 2.1.1, Figure 2-4, Page 2-7.

The legend does not give a description of the material shown in I-6 between the 900-920 foot level.

Section 3

11. Section 3.1.2, Page 3-1, Paragraph 4, Line 3.

The RFI states that most VOC's are in the vicinity of the closed lagoon at depths less than 20 feet. In the Groundwater Quality Assessment Report, Page 4-5, it states as follows: "...the shallow zone near the lagoon consists of a high percentage of fill, with some silt and clay, which significantly affects water levels. Due to the lack of adequate shallow well control away from the lagoon area, it was not possible to incorporate the shallow fill zone into the model..." Thus, the area where prediction is most needed cannot be modeled.

12. Section 3.2.1, Page 3-3, Paragraph 2, Line 2.

The RFI states that soils could migrate through surface water runoff. Do you mean by soil erosion? Please clarify.

13. Section 3.2.4, Page 3-4, Paragraph 1.

This paragraph is confusing.

14. Section 3.2.4, Figure 3-1, Page 3-9.

The locations of the inactive and active hazardous waste storage areas and the inactive incinerator are different from what was stated in previous documents.

Section 4

15. Section 4, Figure 4-1, Page 4-2.

No map scale is shown here. Of the seven proposed monitoring well locations three are in the vicinity of Ohio Water Service wells 1, 2, and 3. They are indicated as interface wells which means they will be deeper than OWS-1, 2, and 3, but probably not much deeper. The chemical data to be gained from the three new wells will probably not be any different from data already available from OWS-1, 2, and 3.

16. Section 4.1, 2.1, Page 4-8.

Please identify all proposed soil sampling locations on a detailed map.

17. Section 4.1.3.1, Page 4-8, Paragraph 3.

The RFI states that the model (MODFLOW) is in need of "refinement." You will use the hydraulic information derived from the new monitoring wells

17. Section 4.1.3.1, Page 4-8, Paragraph 3. cont.

in the refinement process, including transmissivity and storativity. How do you plan to determine these factors; from slug tests? If so, you should read the paper by Cooper et al in Water Resources Research V3, No. 1 entitled, "Response of a Finite Diameter Well to an Instantaneous Charge of Water." The authors point out that, "a determination of S by this method has questionable reliability." You also quote from Ferris et al, 1962, in Theory of Aquifer Tests (USGS Water-Supply Paper 1536-E), as follows: "...the duration of a 'slug' test is very short, hence the estimated transmissibility determined from the test will be representative only of the water-bearing material close to the well. Serious errors will be introduced unless the...well is fully developed and completely penetrates the aquifer." Slug tests of monitoring wells, where the screens are surrounded by an artificial envelope of graded gravel, won't give useful values. Why refine an inadequate model? You won't be able to get enough data from the new monitoring wells to help much, when only one of seven proposed locations are on site.

18. Section 4.1.3.2, Page 4-9, Paragraph 2, Line 2.

We question if the model is inferior, needs refinement, and cannot incorporate the area of principle contamination; why you need a solute transport model which, will suffer from the same inadequacies?

19. Section 4.2.3.2, Page 4-9, Figure A-1, Page A-9.

The outfall is on the south side of Newman Creek instead of on the north side as shown.

SPECIFIC COMMENTS ON MONTHLY GROUNDWATER SAMPLING RESULTS

21. There is some concern over sampling data from Ohio Water Service Wells #1 and #3 analyzed on May 12, 1989. They both have concentrations of 2 ppb Vinyl Chloride detected. The maximum MCL allowed by U.S. EPA Drinking Water Standards is 2 ppb.

General Comments

22. Please provide a Community Relations Plan as indicated in the RFI Scope of Work.

23. Please provide a map of surrounding land uses (residential, commercial, agricultural, recreational).

24. Please list any enforcement actions and their subsequent resolutions.

25. Is there any groundwater quality data from piezometers P-3, P-4, or P-5? All groundwater flow and data from the piezometers should be evaluated and the data presented. The off-site piezometer (P-4) would provide useful information regarding the groundwater quality and flow direction in the outwash deposits with respect to the direction of movement of the VOC contamination that is present at the facility with regards to the Ohio Water Service Wells, 1, 2, and 3.

26. Due to the presence of extremely elevated levels of metal constituents in the lagoon deposits, dissolved metal constituents should be monitored in all "L" series wells on a quarterly basis.

27. A shallow groundwater monitoring well must be installed at the R-4/I-4 well cluster. The shallow well at this location should be located near the top of the water table at an elevation between 890 to 910 feet mean sea level (maximum screen length should not exceed 10 feet). This additional shallow well will assist in determining the groundwater quality and provide for additional groundwater flow evaluations.

28. Ekco Housewares should determine the full vertical extent of contamination in the bedrock aquifer. Well nests should be screened at different levels in the bedrock in order to determine this.

29. Ekco Housewares has proposed to collect one round of groundwater samples for the newly proposed monitoring wells during the RFI/CMS investigation data collection period. Samplings should be conducted quarterly to define any groundwater quality fluctuations due to seasonal effects. The additional groundwater sampling also will assist with calibration and verification of the computer models that will be used to address potential remediation methodologies.

30. Groundwater elevations should be determined quarterly for all on-site and off-site monitoring wells, production wells, water supply wells, and surface water elevations in Newman Creek and the Tuscarawas River.

31. Ekco Housewares has proposed to use low-carbon steel risers with stainless steel screens. Wells must be stainless steel to 5 feet above the seasonally high water table. Above that, either PVC or carbon steel may be used. Please propose a maintenance schedule to ensure the integrity of the joint between the materials. The use of two different metals may cause cathodic corrosion, thus compromising the integrity of the monitoring well.

32. Ekco Housewares has proposed to use potable water in drilling procedures. Analysis of this fluid must be completed and its use approved prior to drilling.

33. Ekco Housewares must perform additional testing in the I-series and S-series monitoring wells to determine the aquifer properties for the sand and gravel outwash aquifer. A significant portion of the groundwater computer modeling utilizes physical characteristic parameters for the sand and gravel outwash aquifer. Ekco Housewares should perform pump tests in order to evaluate representative in-situ aquifer properties (transmissivity, storativity, hydraulic conductivity) in the sand and gravel outwash deposits.

34. Ekco Housewares must collect continuous soil samples from the deepest boring at each of the newly installed well clusters. The data collected will improve interpretation of the geologic materials at these off-site locations.

35. Please provide a map of all known past and present product and waste underground piping.

36. The interface monitoring well I-7 indicates VOC contamination. In order to define the vertical extent of contamination at this location, a bedrock monitoring well should be installed adjacent to monitoring well I-7. Monitoring wells R-5 and L-5 both indicate VOC contamination.

37. Monitoring well L-5 contains significant concentration of vinyl chloride (100 mg/l) that is well above the maximum contaminant level of 2 ug/l. EKCO should provide a more thorough evaluation of rate and extent of contamination and determine if the source is the RCRA regulated surface impoundment or from another source.

38. ECKO has not collected groundwater samples quarterly from the RCRA lagoon monitoring wells (L series). This is required for facilities in assessment monitoring. ECKO must initiate quarterly sampling in the L series wells and the R series where contamination has been detected. These samples should be analyzed for all the constituents as presented in the groundwater quality assessment report. During the December 1988, groundwater sampling event, Weston Consultants performed specialized sampling procedures to determine if dense phase immiscible layers of organic compounds were present in the monitoring wells. However, the results of this specialized sampling event were not described in the GWQAR or the RFI/CMS.

    ECKO Housewares should fully describe the specialized sampling event and provide a detailed evaluation of the results.

5HR-12:SAVERILL:sbowie:6-4439:disk #1:EKCO.NOD:11/15/89

OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Toward A Cleaner Environment
15 Year Anniversary
1972 - 1987

Richard F. Celeste
Governor

August 24, 1989

Ms. Sally Averill
Ohio Technical Enforcement Section
Hazardous Waste Enforcement Branch
U.S. EPA - Region V
230 South Dearborn Street
Chicago, Illinois 60604

RE: Ekco Housewares - RFI/CMS Work Plan

Dear Ms. Averill:

The Ohio EPA, Division of Ground Water has reviewed the Ekco Housewares RFI/CMS Work Plan and has the following comments regarding its contents and recommendations for supplemental monitoring requirements. Addressing these comments will aid in defining the rate and extent of ground water contamination and provide valuable data for all ground water modeling efforts.

1. As previously described in Michael Eggert's July 10, 1989 letter, Ohio EPA-Division of Ground Water recommends the installation of a shallow ground water monitoring well at the R-4/I-4 well cluster. The shallow well at this location should be located near the top of the water table at an elevation between 890 to 910 feet mean sea level. This additional shallow well will assist in determining the ground water quality and provide for additional ground water flow evaluations.

2. Ekco Housewares should determine the full vertical extent of contamination in the bedrock monitoring wells. As described in Michael Eggert's July 10th letter, multilevel packer sampling should be conducted in the bedrock monitoring wells.

3. Ekco housewares has proposed to collect one round of ground water samples for the newly proposed monitoring wells during the RFI/CMS investigation data collection period. Ohio EPA, Division of Ground Water recommends that the facility sample quarterly (at a minimum, semi-annually) to define the ground water quality due to seasonal effects. The additional ground water sampling also will assist with calibration and verification of the computer models that will be used to address potential remediation methodologies.

4. Ground water elevations should be determined quarterly for all on-site and off-site monitoring wells, production wells, water supply wells, and surface water elevations determined in Newman Creek and the Tuscarawas River.

5. Ekco Housewares has proposed to use low-carbon steel risers with stainless steel screens. The Division of Ground Water requests the facility propose a maintenance schedule to ensure the integrity of the joint between the materials. The use of two different metals may cause cathodic corrosion, thus compromising the integrity of the monitoring well.

6. Ekco Housewares has proposed to use potable water for drilling installation procedures. It is recommended that samples of this fluid be collected and analyzed for appropriate site specific constituents if used during drilling.

7. It is recommended that Ekco Housewares perform additional testing in the I-series and S-series monitoring wells to determine the aquifer properties for the sand and gravel outwash aquifer. A significant portion of the ground water computer modeling utilizes physical characteristic parameters for the sand and gravel outwash aquifer. Ekco Housewares should perform pump tests in order to evaluate representative in-situ aquifer properties (transmissivity, storativity, hydraulic conductivity) in the sand and gravel outwash deposits.

8. Ekco Housewares should collect continuous soil borings at each of the newly installed well clusters. The data collected will improve interpretation of the geologic materials at these off-site locations.

9. The proposed schedule in the RFI/CMS Work Plan for the facility investigation phase should be reduced to 3 months from six (6) months. The monitoring well installations and soil boring could be completed in six (6) weeks. The majority of the ground water data to be collected are VOC's that have only a two week laboratory holding time. Due to the limited holding time for these constituents, the sampling analysis time period could be reduced to six (6) weeks allowing for internal laboratory QA/QC. If USEPA can transmit comments/conditions and approve the RFI/CMS Work Plan by September, the field investigation could be completed by the end of 1989.

Michael Eggert, Technical Services Section, was primarily responsible for this review. If you have any questions concerning these comments or recommendations, please feel free to contact him at (614) 644-2905.

Sincerely,

Janice A. Carlson, Manager
Technical Services Section
Division of Ground Water

MLE/rs
EGGERT\AVERILL

cc: Carl A. Wilhelm, Ohio EPA, Chief, DGW
Michael Eggert, Ohio EPA, DGW
Mike Savage, Ohio EPA, DSHWM
Debbie Berg/Susan McCauslin, Ohio EPA, DSHWM-NEDO
Chris Khourey, Ohio EPA, DGW-NEDO
File

JUN 20 1989

5HR-12

Mr. Gerald Myers
Metcalf and Eddy
6480 Busch Boulevard
Suite 200
Columbus, Ohio 43229

Dear Mr. Myers:

Enclosed please find the RCRA Facility Investigation/Corrective Measures Studies (RFI/CMS) Workplan the Groundwater Quality Assessment Report and the monthly groundwater sampling results for Ekco Housewares in Massillon, Ohio.

As described in the Statement of Work, the review of the RFI/CMS plan is due to the U.S. EPA within 30 days from the date of receipt.

If you should have any questions, please contact Ms. Sally Averill at (312) 886-4439.

Sincerely yours,

Kevin Pierard, Chief
Ohio/Minnesota Technical Enforcement Section

5HR-12:SAVERILL:sbowie:6-4439:6/18/89:disk #1:ekco.mye

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O. R. A.D.D.	WMD DIR
INIT. DATE	SHB 6/19	6/19			6-19					

WESTON
MANAGERS DESIGNERS/CONSULTANTS
WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

9 June 1989

Ms. Sally Averill
Project Manager
U S EPA, Region 5
230 S. Dearborn Street
Chicago, IL 60604

W.O.# 2994-02-03

Re: RFI/CMS Work Plan
EKCO Housewares, Inc.

Dear Ms. Averill:

Enclosed you will find another cover letter to replace the letter you received with the RFI/CMS Work Plan package I mailed on 5 June 1989. The original letter did not have the appropriate number of individuals formatted on the bottom of the letter as part of the distribution list. Since Tim McGuinness asked for the expansion of the list, I am sending you an updated letter for your records.

If there are any questions, please contact me at (215) 344-3643.

Very truly yours,

ROY F. WESTON, INC.

Harold G. Byer, Jr.
Project Manager

cc: Mr. Timothy McGuinness - American Home Products

HGB/tr

WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

5 June 1989

Ms. Sally Averill
Project Manager
U S EPA, Region 5
230 S. Dearborn Street
Chicago, IL 60604

W.O.# 2994-02-03

Re: RFI/CMS Work Plan
EKCO Housewares, Inc.

Dear Ms. Averill:

Mr. Timothy McGuinness of American Home Products directed WESTON to submit the enclosed RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) Work Plan for your review. As you are aware, the EKCO Housewares RFI/CMS required an extensive amount of discussion and negotiation over the last few months. Also, a large amount of the data required to support the RFI/CMS effort was previously supplied to EPA Region 5 in the form of the Phase II Groundwater Assessment Report WESTON sent to you on 8 May 1989. We hope everything is in order for both of these documents.

If there are any questions, please do not hesitate to contact me at (215) 344-3643.

Very truly yours,

ROY F. WESTON, INC.

Harold G Byer, Jr.

Harold G. Byer, Jr.
Project Manager

cc: Mr. T. McGuinness - American Home Products
Mr. T. Shingleton - EKCO

HGB/tr